

November 15, 2016

Gregory Watson
Manager of Comprehensive Permit Programs
Massachusetts Housing Finance Agency
One Beacon Street
Boston, MA 02108

RE: Medfield Meadows Application for Chapter 40B Project Eligibility/Site Approval

Dear Mr. Watson:

In accordance with 760 CMR 56.04(3), this letter is respectfully submitted to Massachusetts Housing Finance Agency ("MHFA") on behalf of numerous residents in Medfield, who strongly oppose the above-referenced proposed development by applicant, Medfield Meadows LLC ("Medfield Meadows"). This letter constitutes our comments concerning the proposed affordable housing development in our Town. Medfield is a small community with a unique charm. It has a long and storied history, which includes embracing the goals of Ch. 40 B, as expressed in the actual building of numerous affordable housing units. The enormity, aberrant scope and density of this proposed development is dramatically discordant with the small, single-family dwellings of our Town — including existing Ch. 40 B affordable housing units. Medfield Meadow's proposal clearly contravenes not only the statutory purposes and permissible scope of Ch. 40 B, but also, the spirit of that law as well.

For the reasons stated herein, the proposal fails to comply with the applicable statutory provisions governing site eligibility requirements pursuant to 760 CMR 56.04 (4). Most notably, the proposal is deficient in the following regards:

- Conceptual Project Design
- Environment, Health and Safety
- Financial Feasibility.

A. Conceptual Project Design

A conceptual project design is generally appropriate for the site on which it is located taking into consideration factors that may include proposed use, conceptual site plan and building massing, topography, environmental resources and integration into existing development patterns...(760 CMR 56.04 (4)(c)).

1. Proposed Use, Conceptual Site Plan

Fundamentally, the proposed site plan would create a safety hazard for its occupants. The development is comprised of two buildings separated by a State-numbered Highway (Route 27), which is a significant commuter route for travelers between the Metro-West Framingham area, Route 1, Interstate 95 and many towns

in between. The two buildings will share management, marketing and amenity programs, which will be used according to resident demand between both buildings (e.g. multiple tot lots, community rooms of varying sizes). Furthermore, the only fitness center in the development will be in the South building.

The two buildings will also share parking. The North Building is designed to house 121 underground parking spaces for a building with 110 units. The South Building will house 148 underground parking spaces for a building with only 90 units. Thus, should one parking garage be full, residents will seek parking in the other building. Furthermore, the preponderance of visitor parking appears to be the gravel parking lot on the North property grounds.

Additionally, as is the nature of residential complexes, residents will wish to seek out and foster social relationships, especially in relation to their children. The need and desire for residents to travel between the two buildings is apparent and the obvious safety risks with pedestrians of all ages crossing a State highway where the speed limit is 45 mph are unacceptable. For example, police were called to respond to seven accidents at this intersection in the past five years. For these reasons, the “Proposed Use” of the property is hazardous and conceptually inappropriate.

2. Building Massing

It is important to note that pursuant to the statute, the subsidizing agency *must* ensure that the massing of any Ch. 40 B project should be modulated and/or stepped in perceived height, bulk and scale to create an appropriate transition to adjoining sites. *Guidelines on G.L. C.40B Comprehensive Permit Projects Subsidized Housing Inventory* (“Guidelines”) (December 2014), § IV.A 3.b(1)(a) “(760CMR 56.04(4)(c)). See Also, *Handbook: Approach To Chapter 40b Design Reviews*, The Cecil Group, (2011) (“Generally, a Project is developed in the context of single family dwellings and introduces a different form of housing into the neighborhood. Assuming that this is the case, it is important to mitigate the height and scale of the buildings to adjoining sites. In this context, it is particularly important to consider the predominant building types, setbacks, and roof lines of the existing context.”), Id.p.4¹

The building design shows some modulation from public viewing angles (from State highway, Route 27), which gives a muted stepped-in perception to those driving by; however, the design lacks stepped-in variation to abutting properties. At every location where the development impinges on a neighborhood, the building is at the highest height with 90-degree angles, which provides no transition to adjoining sites. The South Building directly abuts three homes, across Grove Street, where the setback from Grove Street will be no more than 12 feet, before a four-story (48 foot) monolithic structure rises. The five-story (59 foot) face of the rear

¹ This Handbook was prepared by the Cecil Group specifically for DCHD and MHFA.

side of the North Building directly abuts five properties, with only a 48 foot fire lane separating the massive structure from adjoining properties. This infringement of privacy, sunlight and neighborhood continuity is unacceptable.

3. Topography

Guidelines, § IV.A.3.b(1.)(b) provides that, “Where possible, the site plan should take advantage of the natural topography and site features, or the addition of landscaping, to help buffer massing.” The site plan is wholly inconsistent with these established and best-practices guidelines.

The proposed plan will require removal of existing mature trees and vegetation to accommodate the oversized buildings on the site. Furthermore, there is a lack of natural or artificial screening to reduce the impact of massing and foster integration to abutters’ properties. Indeed, by virtue of its unorthodox scope and density, the footprints of both buildings completely fill the selected building sites, thereby precluding effective screening to Dale, Grove and North Meadows roadways. More significantly, the proposed fire lane/emergency access lane around the rear of the North building prohibits the use of trees or other vegetation for screening purposes.

4. Integration Into Existing Development Patterns

The scaling and style of the proposed plan is inappropriate for neighboring homes, which are modest ranch and cape style homes. Guidelines § IV.A. 3.b.(1.)(c) provides that, “Design may use architectural details, color and materials taken from the existing context as a means of addressing the perception of mass and height.” The proposed plan clearly does not conform to these standards. Medfield is a small town with church steeples, historic homes and an old-fashioned town center. Our Town does not have any 5-story buildings. Current zoning by-laws restrict homes in residentially zoned areas to no more than 2.5 stories in height. Furthermore, the Dale Street neighborhood area is generally small in stature and the proposed buildings will completely dwarf the surrounding homes. The typical neighborhood area home is a cape-style three-bedroom, built in the 1950s or early 1960s. These neighboring homes are in stark contrast with the proposed contemporary, bloc style housing, completely lacking any traditional roof peaks or triangular stylings. Most tellingly, we note that the photographs provided in the Application curiously fail to show any neighboring residences at all. We submit this omission was not inadvertent. We have included photographs of nearby homes and streets in Exhibit A.

In addition, the rear of the North building at Thomas Clewes, John Crowder, and Joseph Pace roads, abuts the **Allendale** housing units — one of our Town’s existing **40 B developments**. These modest two-bedroom, cape-style homes were each built on eighth-acre plots in 1992 in a style very similar to the pre-existing homes from four decades earlier. These housing units are an example of a 40 B development that not only conforms to the Guidelines and statute, but also is in harmony with and enhances the surrounding housing environment. The current population of Allendale includes many of the original home-owners, including many

who work for the Town itself. At one time, expansion of Allendale into the 39-41 Dale street plots was being considered to supplement the Town's existing stock of affordable housing. Local residents would have welcomed such an expansion of 40B housing in our area.

5. Relationship to Adjacent Streets

The manner in which the proposed buildings relate to adjacent streets is critically important. Massing should take into account **the pattern of the existing street frontage** as well as maintain a human scale by reasonably relating the height of buildings to the width of the public way. Guidelines, § IV A. 3.b.(2.). This project fails to adhere to these requirements in several ways. Firstly, Dale Street is a highly-trafficked street. Morning and afternoon gridlock conditions on Main Street (Route 109) between Brook Street and the Charles River make Dale Street an alternative cut-through for traffic moving east-west and west-east on the Route 109 corridor (see *Exhibit B*).

Secondly, Dale Street is quite narrow, having at most intermittent sidewalks on much of its length. The project design for the South Building shows one access point for this building, which is on Dale Street at a point where the road curves, creating a sight line hazard for vehicles exiting the parking lot and vehicles approaching the intersection with Route 27. These issues are compounded in the winter, when incomplete snow removal effectively narrows the roads further. Finally, The North Building will have access/egress just feet from the offset intersection created by the emptying of Frairy Street into Dale. Frairy Street is itself highly traveled, as it is the only street on the north side of Route 109 that passes underneath the Framingham Secondary Railroad Line, used by CSX freight trains. It is also the most direct route to the Town center from the north and west of town, bypassing the intersection with Route 109 (see *Exhibit C*).

The proposed development would thus have an access point 42 feet (roughly two car lengths) from the intersection with Frairy, itself just 70 feet (roughly three car lengths) from the traffic signal at North Meadows Road. This is a recipe for further gridlock in the area. Such road offsets are discouraged in the MassDOT Project Development and Design Guide (Section 6.8), where a **minimum distance of 50-75 feet is encouraged** between such access points. Furthermore, installation of a signal at this intersection would be contrary to MassDOT guidelines, which require a **minimum of 200 feet** between signal lights (ibid). Finally, Grove Street, which is currently a lightly traveled road mainly used by its residents, will become a tempting cut-through to by-pass the congestion of the light cycles at the intersection between Dale Street and Route 27.

6. Density

Appropriate density of residential dwellings in a 40 B project depends upon a myriad of interconnected factors and must be determined case by case. See, Guidelines, § IV.A.3.b.(3). Medfield is a small, quaint Town with existing dwellings

consonant with its size. Medfield Meadows is seeking to build **388 bedrooms** on 6.2 acres, for a density of **62.6 bedrooms per acre**. All of the bedrooms, be they rental units or owner-occupied, **within a quarter-mile radius** of the intersection of Dale Street and Route 27, amount to only **514 bedrooms**. Thus, the Applicants are seeking to squeeze all of the bedrooms in the entire neighborhood into two (non-contiguous) plots of 3 acres each (see *Exhibit D*). The average density over that quarter-mile radius is only **4.1 bedrooms per acre**. The proposed development thus **increases density in the area by a factor of 1500%**. Here, for the reasons delineated above, it is clear that the desired density of North Meadow's proposed project is wholly at odds with and detracts from the existing architecture of our Town. As such, it does not conform even with the most liberal interpretation of § IV.A 3. b.(3).

B. Environment, Health and Safety

The topics raised in this section pertain to issues defined as "Local Concerns" in 760 CMR 56.01. The paramount issue raised in any appeal of a ruling of the Housing Appeals Committee ("HAC"), is whether "local needs" outweigh the regional need for affordable housing. 760 CMR 56.07 (2) (b.)2 provides in relevant part that, "... the weight of the Local Concern will be commensurate with the degree to which the health and safety of occupants or municipal residents is imperiled, the degree to which the natural environment is endangered..." We submit that the facts and circumstances adduced above, demonstrably prove that in this case, the "local concerns" of our Town outweigh the regional need for affordable housing. We ask that MHFA address this pivotal issue now with regards to this application, so as to spare our small Town the specter of costly and time-consuming litigation at the further stages of the Comprehensive Permitting process.

1. First Responder Transit

As noted above, failure to adequately address the adjoining streets in the neighborhood means that the current plan for access and egress to/from the two buildings will exacerbate the already extant gridlock at the intersection of Dale Street and North Meadows Road (Route 27). The North building is just over 500 yards (0.3 miles) from the police and fire station for the Town (see *Exhibit E*). The Dale Street/Fairy Street/Route 27 intersection provides the principal access point for first-responders to all points in Medfield north and west of the stations. The omnipresence of gridlock conditions at this intersection **therefore provides a life-and-death safety problem for much of the Town of Medfield**.

2. First Responder Access

It is decidedly unclear whether or not certain vehicles will have adequate access to the two residential buildings. Of heightened concern is the ability of the Town of Medfield Fire Department to access the North Building. The traffic circle on the North Building site is designed with the minimum allowed turning radius, suitable for school buses and other 30-foot long vehicles. Turntable ladder trucks and tiller trucks ("hook and ladder trucks") require a larger turning radius [MassDOT Project

Development and Design Guide (Section 6.3)]. The latter type of engine will likely be needed to carry ladders sufficient to reach the fifth story of the North Building.

Similarly, it is unclear whether such trucks can make the sharp turn needed to enter the fire lane from the small roads Joseph Pace Road and John Crowder Road. Both roads are currently short cul-de-sacs with two houses on each side. There are often vehicles parked on either side, which would impede access from first responders in an emergency situation. Finally, current fire trucks cannot enter the underground parking structures on either site under current designs, due to the grade and low overhead clearance. Any emergency that requires such access will therefore be impossible to address.

3. Idling Traffic

Traffic backup waiting to enter the Dale Street/Route 27 intersection often extends to (and beyond) the location for the entrance/exit of the proposed development. One must therefore expect extended traffic backups within the residential complex itself. For the South Building, the entrance point is blocked when roughly 8 cars are stopped on Dale Street at the intersection with Route 27. Such backups are common in the mornings (see Section A.5 above). Residents of the Dale Street neighborhood observed traffic over the hours of 6:30AM-8:30AM during the weeks of October 3 and October 10. Backups extending all the way to Grove Street were a common sight (see, for example, *Exhibit F*). Traffic extended to the proposed entrance to the South Building 41.4% of the time during this peak interval, over the time studied.

For the North Building, the entrance point is blocked when 6 or more cars are stopped on Dale Street at the intersection with Route 27. Such backups are common in the afternoons (see Section A.5 above). Residents of the Dale Street neighborhood observed traffic over the hours of 3:30PM-5:30PM during the weeks of October 3 and October 10. Backups extending well down Dale Street were a common sight (see, for example, *Exhibit G*). Traffic extended to the proposed Dale Street entrance to the North Building 29.7% of the time during this peak interval, over the time studied.

During these lengthy periods when entrance/exit from the parking garages are impassible, cars will be idling. For the South Building, these cars may well be backed up into the underground garage itself, producing a carbon monoxide hazard to other residents within the underground garage and potentially the apartments above. For the North Building the problem is worse, in that the idling cars will be in close proximity to one of the two “tot lots”, and adjacent to the current Town of Medfield school bus pick up spots. Thus one can expect children of various ages to be inhaling car exhaust for significant periods of time with the current development scheme. A study by researchers at UCLA linked high levels of ambient car exhaust to complications with pregnancy and an increase in incidents of asthma in young children (see *Exhibit H*).

4. Destruction of Wetland Habitat

Medfield Meadows' intentional design effectively shoehorns an inordinate density into a small allotted acreage which presents additional insuperable hazards to the environment. In addition to the above-mentioned threats to air quality and the removal of vegetation, one must also consider the certified vernal pool wetland present on the South Building property. The development plans evade the designated footprint of this wetland area by a very small margin (see page 52 in the PDF file of the Site Application). In particular, the building is less than 10 feet from the wetland catchment area. Similarly, the traffic circle and parking lot are separated from the wetland by only a sharp retaining wall. Local residents report frequent observation of fox, deer, possum and migratory birds in this adjoining space, among other fauna. It is unclear to what extent said creatures will be able to access this natural habitat once the planned construction is in place.

5. Aquifer Management

Much of the South Building site is within the Aquifer Replenishment Zone for Well #1 of the Medfield Town water supply. The area designated for aquifer replenishment will be mostly paved, according to the current plans. This has profound implications for a Town whose low water supply has been a chronic problem in recent years.

6. Sanitation

Medfield Meadows' application does not address the key issue of garbage removal. The Town of Medfield does not offer municipal trash collection. It is unrealistic to expect each of the 200 unit residents to contract individually with private trash collection companies, or to haul their trash to the Town Transfer Station themselves on a regular basis. Thus, the developer should include provisions for proper sanitation in the design. A good rule of thumb is that a person generates three pounds of garbage per day (see *Exhibit I*). Taking a conservative estimate of 400 residents (the actual number will no doubt be much higher), we would estimate 8400 pounds of garbage a week. Using the rule that a cubic yard of garbage typically weighs about 175 pounds, we would estimate 48 cubic yards of trash per week. That represents 12 of the typical, four-yard dumpsters. Where are they to be located? On the tot lot? In the fire lane? There is simply insufficient undeveloped land on which to site these dumpsters, suggesting a potential health and vermin problem from inadequate sanitation.

C. Financial Feasibility

760 CMR 56.04 (4)(d) provides in relevant part that, the Subsidizing Agency is charged with considering whether or not the proposed project appears financially feasible. We believe the inexperience of the current developers, in conjunction with a close examination of the structure of Medfield Meadows limited liability company, bodes ill for the financial feasibility of

the proposed project. A review of the questionable — indeed, non-existent — qualifications of the disclosed shareholders, as well as the issue of the participation of apparent undisclosed principals, will prove instructive and will demonstrate that the financial viability of the proposed project is dubious. It is of paramount importance to note that this proposal is the applicant's first development project in the United States. Furthermore, MHFA has a duty to ensure that the applicant has access to sufficient and stable financing so as to reliably predict whether a project, once begun, will be carried to completion. Listed below are several factors that raise substantial doubts about the feasibility of this project.

1. Past 40B Experience

Section 6 of the Application asks for "Applicant Entity 40B Experience". In this case, the applicant entity of relevance is Medfield Meadows LLC, and its principals John Kelly and Karina Corrigan. Yet each development listed under the role of "Developer" (developments in Winchester, Needham, and Newton) are actually projects developed by SEB, LLC (the permitting consultants). This should be interpreted as an indication that the applicant entity has zero experience in building 40B housing.

2. Development Team Qualifications

The instructions for Section 6.1 of the Application read "Particular attention should be given to demonstrating **experience with (i) projects of a similar scale and complexity** of site conditions, ..., (iii) design, and (iv) **financing**. The **development team should demonstrate the ability to perform as proposed and to complete the Project** in a competent and timely manner..." The attached "resume" for Medfield Meadows LLC (pages 103 and 104 in the PDF file of the Site Application) lists six specific projects, three in Ireland and one each in Toronto, Italy and the United Kingdom. None of these six specific examples is in the United States. None of these six specific examples involves rental housing; in fact, four of the six do not involve any sort of housing at all.

The five European properties were developed between 10 and 15 years ago. John Kelly would have been a teenager during their design and construction, and thus none could conceivably be considered "experience" for this individual. There is no evidence that either John Kelly or Karina Corrigan had any role in the development of these projects. On the contrary, all five were developed by Patrick Kelly (father of John Kelly) and the now-bankrupt company Redquartz Properties. If Patrick Kelly is intended to be the principal developer, he should have been listed as such in Section 6 of the application, with corresponding disclosure under the "Certification" section (see *Exhibit J*). Furthermore, the Toronto condominiums were developed by Urban Capital, with Red Quartz Development appearing only in an "associative role."

At least four of the five European developments became the property of the National Asset Management Agency of the Republic of Ireland upon the bankruptcy of Redquartz Properties (see *Exhibit K*). The attached "resume" for Medfield

Meadows LLC (pages 103 and 104 in the PDF file of the Site Application) mentions “\$25M+ in sales of luxury single family homes [in the Greater Boston Area]. The specific reference is to **sale** of homes, not **construction** of homes.

The reference is not specific, and thus cannot be conclusively used to establish that either applicant, John Kelly or Karina Corrigan, were involved in the sale (let alone the construction) of said homes. We submit that sales of two or three dozen luxury homes in the Boston area does not constitute adequate experience for the development of 200 rental units in buildings with over 120,000 GFA each.

3. Development Team Affiliates

Section 6 of the Application asks applicants to list all Affiliates of the Applicant, being defined as “...all entities that are related to the subject organization by reason of common control, **financial interdependence** or other means.” As mentioned above, the development experience attributed to Medfield Meadows LLC seems to apply solely to Patrick Kelly, the father of John Kelly. Patrick Kelly was in attendance at the 9/8/2016 meeting with Town officials, headed by Town Planner Sarah Raposa. The minutes of that meeting list him as “RQC Developer” (see Exhibit L).

Karina Corrigan was not present at the 9/8/2016 meeting, but her husband, Patrick Corrigan, was in attendance. The minutes list him as “Medfield Meadows LLC”. This would suggest that both men, Patrick Kelly and Patrick Corrigan, are part of the development team, and therefore “affiliates” of the Applicant. To support this, we note that John Kelly, when addressing the 800+ attendees at a public meeting of the Board of Selectmen on October 18, used the words “the three of us” when describing the “100+ years of experience” his team has. Furthermore, only Patrick Corrigan could be truly described as having any demonstrable development experience in the Commonwealth. Patrick Kelly (of Redquartz Properties) and Patrick Corrigan (of Cordil Construction) were occasional business partners in developments in the Republic of Ireland. It would thus appear that these two individuals are integral parts of the development team and should have been listed as such (see Exhibit M).

4. Development Team Certification

Section 6 of the Application asks for various forms of disclosure with regards to the Applicant Entities. Since it appears that Patrick Kelly and Patrick Corrigan are the real parties-in-interest of the Development Team, their past and current financial circumstances are clearly relevant for a determination of the financial feasibility of the current proposal. Both Redquartz Properties and Cordil Construction suffered bankruptcy after the collapse of the Irish property bubble in 2009 (see Exhibit N). Furthermore, according to public records, Patrick Corrigan has sought personal bankruptcy protection under Chapter 7 within the last twelve months, estimating nearly \$43 million in liabilities to various creditors in the United States and abroad. **Karina Corrigan is named as a co-debtor** for more than one liability listed (see Exhibit O).

These issues are relevant, as the Applicant has indicated that \$9.44M of the initial capital budget is to come from Owner's Cash Equity. Given the perfunctory and highly misleading disclosures by which the Development Team has described itself, and the current financial difficulties of the "shadow affiliates", we believe that this number should be called into question. In summary, a review of the financial background of the members of the development team reveals a prior financial record that is dismal indeed.

D. Summary and Request to Deny Site Eligibility

We strongly urge the Massachusetts Housing Finance Agency to exercise its authority, pursuant to M.G.L. c. 40B § 21, and deny project eligibility approval to the Applicant, Medfield Meadows LLC, for the project described in the Site Approval Application. This proposal, on its face, represents a perversion of the noble purposes and legislative intent of the Affordable Housing Act. In this regard, we want to emphasize fervently to MHFA, that our Town ardently embraces and supports the goals of affordable housing, as evidenced by the actual number of units that have been constructed, and those that are slated to be built, in the immediate future. Indeed, during a recent public hearing on this project, some of the most vocal and passionate opponents were residents of this Town who have lived in Ch. 40 B housing for many years.

In the current Application, we have argued that the two named individuals, John Kelly and Karina Corrigan, have no demonstrable experience in construction or development whatsoever. Properties identified as indicating "experience" were in fact developed by an individual undisclosed in this application, namely, Patrick Kelly, father of John Kelly. The only individual associated with the named Applicants with known development experience in the Commonwealth is Patrick Corrigan, husband of Karina Corrigan. The deceptive nature of the Application certainly violates the spirit, if not also the letter, of the regulations concerning Chapter 40B housing. The chicanery and subterfuge employed in the preparation of this Application, in and of itself, constitutes sufficient grounds for MHFA to deny project eligibility. It undermines the trust that the municipalities of the Commonwealth put in the process to be fair and transparent. In the current case, it also brings into question whether the proposed development can actually be completed adequately, particularly since the Applicants anticipate using over \$9M in owner-supplied cash to finance the project.

It might be argued that Geoff Engler of SEB LLC, the permitting consultant, supplies more than enough experience in 40B development to compensate for any deficiency in the Applicants. This is an insufficient guarantee, as SEB LLC serves only as the permitting consultant, and will not be overseeing the construction and eventual operation of the rental buildings.

It is instructive to surmise, however, whether SEB LLC would ever submit a design as fundamentally inappropriate for a site as the pending proposal. Here we have a 200 unit development bisected by a busy state-numbered highway: a design as antithetical to the style of the current neighborhood structures as one can possibly imagine, lacking features and setbacks which would reduce its massing and encroachment on neighboring homes; a development out of size and scale with the neighborhood and town, placed at a location miles from transit or freeway access; a site location already gridlocked by rush-hour traffic and an

awkward offset intersection, now being expected to absorb hundreds of additional automobile trips per day, in a neighborhood just a block from two elementary schools and the public safety building; a proposal that would seek to squeeze as many bedrooms as can be found in a quarter-mile radius into two non-contiguous plots of land.

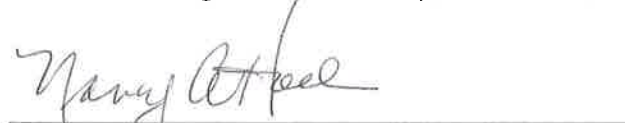
The Application of Medfield Meadows clearly is at odds with, and is a gross distortion of not only the spirit, permissible scope and purposes of Ch. 40 B, but represents an effrontery to the surrounding environment and the existing homes in the neighborhood.

The unfortunate irony in this ordeal is that many of the residents who are writing this letter to you are themselves residents of 40B housing. Indeed, many of the homes impacted in the neighborhood – homes quite literally in the shadow of this behemoth – are in a 40B housing development of appropriate scale, density and style to fit the neighborhood and the Town. We would hope that a decision to refuse eligibility for this particular Applicant would yield a developer of affordable housing with greater responsibility and vision.

The inappropriate nature of the site design is clearly manifest, and the inexperience of the Medfield Meadows LLC Development Team readily apparent. These factors provide a sufficient basis for disqualification of this Application for Site Approval under G.L. c. 40B. We hope that you will come to a similar conclusion.

Sincerely, and on behalf of the 100+ members of the Dale Street Neighborhood Group,


Brent Nelson 28 Dale Street

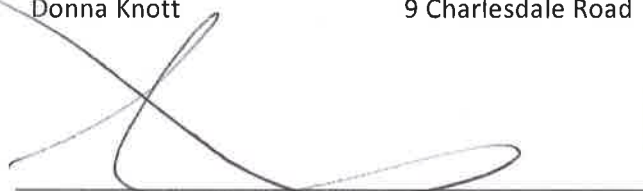

Nancy Hall 30 Dale Street


Andrea Orio 8 Grove Street


Dianne Lambert 10 Grove Street


Donna Knott 9 Charlesdale Road


Mary Beth Reddy 7 Charlesdale Road


Shawn Collins 9 Baker Road


John Kinsellagh 3 Marsh Drive

CC: Jessica L. Malcolm, 40B Specialist, MassHousing

List of Exhibits

- A. Photographs of neighboring streets and homes. See attached Medfield Plot Map for photo locations.
- B. Map of downtown Medfield, showing area of traffic congestion and the Dale Street bypass route.
- C. Map of downtown Medfield, showing the Frairy Street railroad underpass and shortcut to downtown locations.
- D. Parcel map of Medfield, showing all residences within a quarter-mile radius of the intersection of Dale Street and North Meadows Road. The highlighted residences combined have 514 total bedrooms. Medfield Meadows proposes to build 388 bedrooms.
- E. Parcel map of Medfield, showing the location of the Dale Street School, Memorial School, and the Town Police/Fire Station. Note that the Dale Street School serves fourth and fifth graders, many of whom walk to school from the surrounding neighborhood.
- F. Photographs of traffic on Dale Street the morning of October 5, 2016, taken uphill from the proposed “South Building” access/egress point. These photos are typical for weekday mornings during peak commute times.
- G. Photographs of traffic on Dale Street the afternoon of October 10, 2016, taken from the intersection with North Meadows Road, looking back towards the proposed “North Building” access/egress point. These photos are typical for weekday afternoons during peak commute times.
- H. UCLA study on the effects of car exhaust (carbon monoxide) on pregnancy outcomes and asthma in young children.
- I. An example of how to calculate the trash collection requirements for a large community. Developed by the Zender Environmental Research Group.
- J. Evidence that the properties listed as “Experience” for Medfield Meadows LLC were actually built between 2000 and 2009 by a group headed by the applicant’s father, Patrick Kelly.
- K. Evidence that these very same European properties eventually passed into receivership of the National Asset Management Agency (NAMA) as a result of default on loans by associates of the Applicants.

- L. Minutes compiled by Medfield Town Planner, Sarah Raposa, of the first full meeting between the developer team and Town officials (closed to the public). This meeting took place on September 8, 2016. Medfield Meadows LLC and RQC LLC were represented by Patrick and John Kelly, and Patrick Corrigan, respectively.
- M. Evidence of Patrick Corrigan's involvement in Cordil Construction, and association with the Kelly family.
- N. Evidence of the eventual bankruptcies of both the Kelly family (Redquartz Properties) and the Corrigan family (Cordil Construction) in the Republic of Ireland.
- O. Paperwork related to the filing, by Patrick Corrigan, of Chapter 7 bankruptcy protection in the Commonwealth of Massachusetts.
- P. Additional signatures from residents of the Town of Medfield.