



Massachusetts School Building Authority

Deborah B. Goldberg
Chairman, State Treasurer

James A. MacDonald
Chief Executive Officer

John K. McCarthy
Executive Director / Deputy CEO

December 7, 2018

Mr. Peter Light, Superintendent
Acton-Boxborough Regional School District
16 Charter Road
Acton, MA 01720

Re: Acton-Boxborough Regional School District, C.T. Douglas Elementary School

Dear Mr. Light:

The Massachusetts School Building Authority (the "MSBA") is forwarding review comments for the Module 3 Feasibility Study Preliminary Design Program (the "PDP") submission for the C.T. Douglas Elementary School project in the Acton-Boxborough Regional School District (the "District"), received by the MSBA on November 7, 2018.


The MSBA's Module 3 Feasibility Study Guidelines / PDP submittal requires the District and Design team to include an evaluation of all possible options, and the level to which each option fulfills the District's proposed Educational Program. Or, in the case of base repair / code upgrade and addition / renovation options, the proposed design may address a certain level of educational program need. The Study Enrollment Certification letter includes three study enrollments to analyze which might best fit the District's needs, and the District has identified three sites under consideration. Regardless of any conclusions that may have been made in the previous study, all options should be considered equally, and information should be provided to describe the process undertaken to evaluate and eliminate options for further consideration going forward into each following submittal.

Responses to the attached comments shall be forwarded to the assigned Project Coordinator, Brittany Gomes (Brittany.Gomes@MassSchoolBuildings.org), through the Owner's Project Manager. Please review and return responses within 14 days of receipt of this letter.

If you have any questions or comments, please do not hesitate to contact Anthony Proia (Anthony.Proia@MassSchoolBuildings.org).

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Acton-Boxborough PDP Review Comments

Sincerely,

Mary Pichetti 

Mary Pichetti
Director of Capital Planning

Attachments: Attachment 'A' – Module 3 Preliminary Design Program Review Comments

Cc: Legislative Delegation
Katie Green, Chair, Acton Board of Selectmen
John S. Mangiaratti, Acton Town Manager
Susan Bak, Chair, Boxborough Select Board
Ryan Ferrara, Boxborough Town Administrator
Diane Baum, Chair, Acton-Boxborough Regional School Committee
Marie Altieri, Deputy Superintendent, Acton-Boxborough Regional School District
J.D. Head, Director of Facilities and Transportation, Acton-Boxborough Regional School District
Mary Brolin, Acton-Boxborough Regional School District Building Committee
Dale Caldwell, Owner's Project Manager, Skanska USA Building, Inc.
Chuck Adam, Owner's Project Manager, Skanska USA Building, Inc.
Jim Burrows, Owner's Project Manager, Skanska USA Building, Inc.
Larry Spang, Designer, Arrowstreet, Inc.
Emily Grandstaff-Rice, Designer, Arrowstreet, Inc.
File: 10.2 Letters (Region 4)

ATTACHMENT A
MODULE 3 – PRELIMINARY DESIGN PROGRAM REVIEW COMMENTS

District: Acton – Boxborough Regional School District
School: C.T. Douglas Elementary School
Owner's Project Manager: Skanska
Designer Firm: Arrowstreet
Submittal Due Date: November 7, 2018
Submittal Received Date: November 7, 2018
Review Date: November 8 – December 5, 2018
Reviewed by: A. Proia, A. Waldron, K. Brown, J. Jumpe

MSBA REVIEW COMMENTS

The following comments¹ on the Preliminary Design Program (PDP) submittal are issued pursuant to a review of the project submittal document for the proposed project presented as a part of the Feasibility Study submission in accordance with the MSBA Module 3 Guidelines.

General comments regarding the scope of the submittal:

The submittal includes multiple references to the 2014 Dore & Whittier Initial Capital Needs Study and Master Plan. Although some of the analysis and recommendations of this previous report may be informative for the District going forward into the current Feasibility Study, the subsequent information provided by the current design team must be a complete "stand alone" report rather than a continuation or supplement to the Dore & Whittier study.

In that regard, MSBA's Module 3 Feasibility Study Guidelines / Preliminary Design Program ("PDP") submittal requires the District and Design team to include an evaluation of all possible options, and the ability of each option to fulfill the District's proposed Educational Program. The Study Certification letter includes three study enrollments to analyze which might best fit the District's needs, and the District has identified three sites under consideration. Regardless of any conclusions that may have been made in the previous study, all options should be considered equally, and information should be provided to describe the process undertaken to evaluate and eliminate options for further consideration going forward into each following submittal. The following list shows a potential of fourteen options that could have been studied in the Preliminary Design Program:

On the Douglas Site:

- *Code Upgrade Option/Base repair of Douglas School for 650 students*
- *Addition/Renovation of Douglas School for 650 students*

¹ The written comments provided by the MSBA are solely for purposes of determining whether the submittal documents, analysis process, proposed planning concept and any other design documents submitted for MSBA review appear consistent with the MSBA's guidelines and requirements, and are not for the purpose of determining whether the proposed design and its process may meet any legal requirements imposed by federal, state or local law, including, but not limited to, zoning ordinances and by-laws, environmental regulations, building codes, sanitary codes, safety codes and public procurement laws or for the purpose of determining whether the proposed design and process meet any applicable professional standard of care or any other standard of care. Project designers are obligated to implement detailed planning and technical review procedures to effect coordination of design criteria, buildability, and technical adequacy of project concepts. Each city, town and regional school district shall be solely responsible for ensuring that its project development concepts comply with all applicable provisions of federal, state, and local law. The MSBA recommends that each city, town and regional school district have its legal counsel review its development process and subsequent bid documents to ensure that it is in compliance with all provisions of federal, state and local law, prior to bidding. The MSBA shall not be responsible for any legal fees or costs of any kind that may be incurred by a city, town or regional school district in relation to MSBA requirements or the preparation and review of the project's planning process or plans and specifications.

- Addition/Renovation of Douglas School for Douglas/Gates consolidation for 990 students*
- Addition/Renovation of Douglas School for Douglas/Conant consolidation for 1,015 students *
- New Construction Douglas School for 650 students*
- New Construction Douglas/Gates consolidation for 990 students
- New Construction Douglas/Conant consolidation for 1,015 students*

On the Gates Site:

- Base repair of Gates for Douglas/Gates consolidation for 990 students*
- Addition/Renovation of Gates for Douglas/Gates consolidation for 990 students*
- New Construction Douglas/Gates consolidation for 990 students

On the Conant Site:

- Base repair of Conant for Douglas/Conant consolidation for 1,015 students*
- Addition/Renovation of Conant for Douglas/Conant consolidation for 1,015*
- New Construction Douglas/Conant consolidation for 1,015 students
- New Construction Douglas for 650 students*

**(This option not provided in the study)*

In the District’s response to this review, provide information that details the determining factors leading to the District’s decision that each of the options not included in the study are not viable. Provide as much detail as required to present a compelling analysis that these options should not be carried forward into the following preferred Schematic Review submittal, including, if necessary, existing building capacity analyses, site plan “test fits”, comparative cost data, or any other information that shows that the conclusions made to date are valid. Additional related comments are provided below.

Due to the extent of comments below, the District should confirm its ability to submit the Preferred Schematic Report as scheduled on January 2, 2019. If not, please provide an updated work plan/project schedule.

3.1 PRELIMINARY DESIGN PROGRAM

Overview of the Preliminary Design Program Submittal	Complete	Provided; <i>Refer to comments following each section</i>	Not Provided; <i>Refer to comments following each section</i>	Reviewed by District Response to Review (PDR) Status
OPM Certification of Completeness and Conformity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Table of Contents	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.1.1 Introduction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.1.2 Educational Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.1.3 Initial Space Summary	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.1.4 Evaluation of Existing Conditions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.1.5 Site Development Requirements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.1.6 Preliminary Evaluation of Alternatives	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Overview of the Preliminary Design Program Submittal	Complete	Provided; Refer to comments following each section	Not Provided; Refer to comments following each section	Receipt of District's Response; To be filled out by MSBA Staff
3.1.7 Local Actions and Approvals Certification(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.1.8 Appendices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3.1.1 INTRODUCTION

Provide the following Items		Complete; No response required	Provided; District's response required	Not Provided; District's response required	Receipt of District's Response; To be filled out by MSBA Staff
1	Summary of the Facility Deficiencies and Current S.O.I.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	Date of invitation to conduct a Feasibility Study and MSBA Board Action Letter	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	Executed Design Enrollment Certification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	Narrative of the Capital Budget Statement and Target Budget	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	Project Directory with contact information	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	Updated Project Schedule	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

MSBA Review Comments:

6) Note that the MSBA Board of Director's Meeting dates included in the schedule do not match the scheduled 2019 meetings. Refer to the MSBA website for the correct dates and adjust the schedule accordingly.

(http://www.massschoolbuildings.org/about/board_leadership/board_meetings)

No further review comments for this section.

3.1.2 EDUCATIONAL PROGRAM

Provide a summary and description of the existing educational program, and the new or expanded educational vision, specifications, process, teaching philosophy statement, as well as the District's curriculum goals and objectives of the program. Include description of the following items:

Provide the following Items		Complete; No response required	Provided; District's response required	Not Provided; District's response required	Receipt of District's Response; To be filled out by MSBA Staff
1	Grade and School Configuration Policies	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	Class Size Policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	School Scheduling Method	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	Teaching Methodology and Structure				
	a) Administrative and Academic Organization/Structure	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b) Curriculum Delivery Methods and Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Provide the following Items		Complete; No response required	Provided; District's response required	Not Provided; District's response required	
	c) English Language Arts/Literacy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	d) Mathematics	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	e) Science	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	f) Social Studies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	g) World Languages	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	h) Academic Support Programming Spaces	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	i) Student Guidance and Support Services	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5	Teacher Planning and Professional Development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6	Pre-kindergarten	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7	Kindergarten	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8	Lunch Programs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9	Technology Instruction Policies and Program Requirements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10	Media Center/Library	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11	Visual Arts Programs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12	Performing Arts Programs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13	Physical Education Programs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
14	Special Education Programs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
15	Vocation and Technology Programs				
	a) Non-Chapter 74 Programming				
	b) Chapter 74 Programming				
16	Transportation Policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17	Functional and Spatial Relationships	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
18	Security and Visual Access Requirements	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

MSBA Review Comments:

The educational program describes the District's preference to create a "twin" elementary school as recommended by the Dore & Whittier master planning study, although the MSBA Feasibility Study Agreement and Designer RFS describe multiple options, including a potential "consolidation" of two schools (i.e. a single combined school as opposed to two co-located or twin schools), and a required option limited to the Douglas School. The submittal also notes that the two building site options being considered are the existing Gates/Douglas site and the existing Conant Site, which excludes the stated intent to study the Elm Street playground site. Regardless of conclusions from the previous master planning study, the MSBA Feasibility Study must include analysis of all options outlined in the Study Certification letter.

The MSBA notes that a large part of the educational program's focus describes future design needs and the anticipation for a 'twin' school, not current and proposed educational goals. The MSBA encourages the District to develop the educational program in the context of the education of the students rather than a description of facility needs.

In addition to providing a response to the following review comments, the District must provide an updated educational program to be submitted with the subsequent preferred schematic report that addresses the items below; one red-lined copy that indicates changes made to the original submittal, and a second clean copy that documents the updated educational program to inform the feasibility study and design of the proposed project.

1) The submittal notes that each of the different elementary schools has a unique identity and teaching philosophy. The educational program is written to address a twin school only, and no consideration was given for a single school. In the updated educational program provide a narrative explaining each of the schools' current identity and philosophy.

Provide a narrative discussing the open enrollment policy, and how a new facility may impact this, including community support for the project. Specifically, address the local/hometown priority policy, any changes being considered, and how this may affect the broader community support from Boxborough and Acton voters.

4a) The submittal indicates grade level teams, with general classroom teachers delivering instruction in grades K-5. However, it notes that for grade 6 'teachers may specialize for one of the disciplines, or each may instruct in one unit of a discipline.' It is unclear if all grade six teachers are discipline specific teachers, and if not, how that is determined. Clarify and explain the qualifications that are required for each position.

4e) The narrative for how Science, Technology, and Engineering ("STE") is currently taught does not describe an approach to teaching science. Include a brief narrative that describes the current and proposed methods used for STE instruction. In addition, provide a narrative describing what additional STEM learning labs would be used for if the general classroom design incorporates the design needs indicated.

In addition, the MSBA requests more information related to the STEM learning labs, including anticipated users, utilization, how they will be scheduled, who would manage the space, what safety equipment would be included, and what tools and materials are anticipated for delivery of the proposed programming.

4g) The submittal does not indicate the presence of a world language program. However, it does note an English Language Learners program. Has the District considered bi-lingual or multi-lingual activities so that native language proficiency may be preserved while native English-speaking students may learn a second language during what research shows to be the best age for language acquisition? Please elaborate.

4h, i) Not included. Please provide.

8) Indicate the number of lunch seatings proposed by the District and describe how this is coordinated into the overall schedule. Describe why the District has indicated a preference for separate cafeterias.

9) The submittal notes that some classrooms are equipped with FM capabilities based on student needs. Consider providing assisted listening technology in each classroom for hearing impaired accessibility, as well as general use throughout educational spaces within the proposed project.

10) The submittal indicates that the media center will play a role in delivering the Digital Literacy/ Computer Science frameworks. However, no indication was provided for how this space will be staffed, how instruction will occur, or how the space will be scheduled and utilized. Provide this information as part of the updated educational program and indicate who will be responsible for selecting and examining the content of the supplemental classroom material for the bookcases in the classrooms.

11) Provide information related to the scheduling and utilization of the art rooms, how often students have art, and what safety systems are in place that allow the safe exploration of ceramics and woodworking in particular for a young student population.

13) Clarify the frequency that students meet for physical education.

14) The information provided indicates that each school has specific 'learning centers' which are inclusion programs. Provide a more detailed narrative explaining these learning centers, how they are used, scheduled, and how they are different from each other.

Describe any adaptive PE program that exists or may be proposed, including how this program is to be delivered in the proposed project.

No further review comments for this section.

3.1.3 INITIAL SPACE SUMMARY

Provide the following Items		Complete; No response required	Provided; District's response required	Not Provided; District's response required	
1	Space summary; one per approved design enrollment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2	Floor plans of the existing facility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3	Narrative description of reasons for all variances (if any) between proposed net and gross areas as compared to MSBA guidelines	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

MSBA Review Comments:

1) The MSBA has performed an initial review of the provided space summaries and offers the following:

- *Study Enrollment Options:*
 - Option 1: 650 students in grades K-6 (Douglas Elementary only)
 - Option 2: 990 students in grades K-6 (Douglas Elementary & Gates Elementary)
 - Option 3: 1,015 students in grades K-6 (Douglas Elementary & Conant Elementary)
- *Core Academic –*

Anticipated Core Academic Spaces*	650 Student Option	990 Student Option	1,015 Student Option
Pre-Kindergarten Classrooms	10	10	10
Kindergarten Classrooms	5	8	8
General Classrooms- Grades 1-6	23	36	36
Multipurpose Room*	1**	2**	2**

*Provide proposed scheduling information specific to these spaces.

**The MSBA will rely on the District's Educational Program and additional information to understand how proposed spaces that are unique to the District will be utilized in the proposed project.

The submitted educational program notes that 'eight or nine' classroom spaces are needed for the Early Childhood Program / Pre-Kindergarten, while the submitted space summaries include 10 Pre-Kindergarten ("PK") in the proposed program. Enrollment data available on

the Department of Elementary and Secondary Education website indicates that the District has 111 PK students enrolled in the Carol Huebner Early Childhood Program for the 2017-2018 school year. Please describe the current full time equivalent of PK students in the District and the basis for the 10 PK classrooms included in the proposed program.

The MSBA accepts the proposed square footage associated with the proposed Kindergarten and general classrooms as this supports the District's delivery of a three or four section program for grades 1-6 depending on the final selected enrollment. No further action required.

In response to these review comments, provide additional information associated with the scheduling and utilization of the Multipurpose Room, including how this space will be used, monitored, outfitted, and how it supports the educational program. This space was not discussed or included in the District's educational program, despite the space summary narrative stating, 'The District has also identified the need for multipurpose rooms to support their teaching goals.' Provide a detailed narrative that explains what these goals are, and why they are unable to be met in the general classrooms, cafeteria, gymnasium or media center. Eligibility of this additional area will be determined in subsequent phases of the Feasibility Study.

- **Special Education** – *The overall square footage in this category is above the MSBA guidelines. The MSBA also notes that there is a substantial increase over the existing conditions, despite the educational program not noting any new programs, other than a desire to provide more space for the CASE Collaborative. Provide a brief narrative that explains this discrepancy. Note that the Special Education program is subject to approval by the Department of Elementary and Secondary Education ("DESE"). The District should provide the required information required with the Schematic Design submittal. Formal approval of the District's proposed Special Education program by the DESE is a prerequisite for executing a Project Funding Agreement with the MSBA.*
- **Art & Music** – *The overall square footage in this category appears to align with the MSBA guidelines. There are an odd number of proposed art and music rooms, despite the intent to create an even number of music practice/ ensemble rooms for the consolidated school options. Describe how an odd number of rooms will be distributed between the two consolidated schools.*
- **Health & Physical Education** – *The overall square footage in this category appears to align with the MSBA guidelines for the single school configuration and exceeds the MSBA guidelines for the two consolidated school options. This overage is due to the inclusion of a 3,000 nsf 'Health & Wellness' room, and two storerooms and Health Instructor's Offices instead of one. Given that the design enrollment exceeds 900 students in the two larger options, the additional 3,000 gym station is an acceptable variation to the MSBA space guidelines for those two options only. The MSBA does not object to the District providing an additional storeroom and Health Instructor's Office in the project; however, this additional area will be deemed ineligible for reimbursement.*
- **Media Center** – *The overall square footage in this category appears to align with the MSBA guidelines. In future submittals, if the area of the media center is planned to be divided up into discrete areas for different programmatic purposes, update the space summary to reflect this use. No further preliminary comments.*

- **Dining and Food Service** – *The overall square footage in this category appears to exceed the MSBA guidelines in all options. For the 650-student option, this appears to be due to a larger than guideline kitchen. For the two consolidated school options, this is due to the duplication of the stage, chair storage, and staff lunch room. Provide a narrative explaining why this excess area and duplications are necessary. Note that area in excess of MSBA guidelines will be considered ineligible for reimbursement.*
- **Medical** – *The overall square footage in this category appears to align with the MSBA guidelines for the single school configuration and exceeds the MSBA guidelines for the consolidated school options. This overage is due to the duplication of the medical suite toilet and the nurse’s office. MSBA does not object to the District providing these additional spaces in the project; however, any additional area will be deemed ineligible for reimbursement.*
- **Administration & Guidance** – *The overall square footage in this category appears to exceed the MSBA guidelines in all options. For the 650-student option, this appears to be due to additional administrative area for the Preschool component. For the two consolidated school options, this is due to additional administrative area for the Preschool component and duplicated administrative areas for each school. MSBA does not object to the District providing these additional spaces in the project; however, any area beyond that included in the guidelines will be deemed ineligible for reimbursement.*
- **Custodial & Maintenance** – *The overall square footage in this category appears to be under the MSBA guidelines for the single school configuration and exceeds the MSBA guidelines for the consolidated school options. This overage is due to the duplication of the Custodian’s Office and Workshop, as well as the Network Telecom Room. MSBA does not object to the District providing these additional spaces in the project; however, any area beyond that included in the guidelines will be deemed ineligible for reimbursement.*
- **Other** – *The overall square footage in this category appears to exceed the MSBA guidelines in all options. This is due to the inclusion of either one or three Mother’s Rooms depending on the enrollment option. Explain why more than one Mother’s Room is necessary, or as a space reassigned temporarily as needed.*

This review is based on the submitted preliminary space summaries. The submission included an addition/ renovation space summary for the 650-student option, and new construction space summaries for the two combined school options. The final MSBA determination of compliance with MSBA space guidelines in subsequent submittals will vary (in part) depending on the District’s preferred solution and the extent that the proposed spaces are located either in existing construction, substantially renovated existing areas, or newly constructed portions of the proposed facility. MSBA will expect spaces located in new or substantially renovated areas to be compliant with MSBA space standards. Note that upon selection of a preferred solution, the District may be required to adjust spaces/square footage that exceeds the MSBA guidelines and is not supported by the educational program provided.

The existing conditions column of the provided space summaries appears to combine the existing spaces for the combined enrollment options. In response to these comments, provide the existing conditions space summary information for each school separately for accurate documentation and review. These should match the floor plans provided in programmatic use as well as area and quantity. Furthermore, if as a result of this project, the anticipated programming of an existing space is planned to change as a result of the impact of this project, provide updated floor plans and space

summaries in the Preferred Schematic Report. See comment 1 in section 3.1.6 below. Please acknowledge.

No further review comments for this section.

3.1.4 EVALUATION OF EXISTING CONDITIONS

Provide the following Items		Complete; No response required	Provided; District's response required	Not Provided; District's response required	Receipt of District's Response to be filed with the District Staff
1	Confirmation of legal title to the property.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Determination that the property is available for development.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	Existing historically significant features and any related effect on the project design and/or schedule.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	Determination of any development restrictions that may apply.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	Initial Evaluation of building code compliance for the existing facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	Initial Evaluation of Architectural Access Board rules and regulations and their application to a potential project.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7	Preliminary evaluation of significant structural, environmental, geotechnical, or other physical conditions that may impact the cost and evaluations of alternatives.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8	Determination for need and schedule for soils exploration and geotechnical evaluation.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9	Environmental site assessments minimally consisting of a Phase I: Initial Site Investigation performed by a licensed site professional.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10	Assessment of the school for the presence of hazardous materials.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11	Previous existing building and/or site reports, studies, drawings, etc. provided by the district, if any.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

MSBA Review Comments:

1) The information provided includes Assessor's Cards for all three Project Sites as part of the project sites' respective Phase I Environmental Site Assessment ("ESA"). No information related to the titles of all three properties is included. Provide a copy of all available title information in the response to these comments.

In addition, the Local Actions and Approvals Certification includes a note during the September 12, 2018 meeting that the current school sites are made up of multiple parcels, including the Conant site including land owned by the Department of Public Works and a transfer station. However, the Summary of Existing Conditions note the sites as single parcels. Clarify in response to these comments. In the subsequent Preferred Schematic Report the District should

provide site plans of all considered sites that include property/parcel lines showing the extent of School District owned properties. Note that, per MSBA Project Advisory # 45, the MSBA cannot execute a Project Funding Agreement until the School District has full ownership, control, and exclusive use of the land.

2) Option 3 is based on development of the Elm Street Playground site, which is owned by the Town of Acton, not the Acton-Boxborough School District. If the District is planning to carry this option forward in subsequent submittals, describe the approach to determine the District's legal use of this parcel including any potential Article 97 Land Disposition requirements. Note that all costs associated with site acquisition are categorically ineligible for MSBA participation.

3) Not provided. Note that all construction projects that include state funding are required to file a Project Notification Form with the Massachusetts Historical Commission ("MHC"). Describe any historically significant features of all proposed buildings and sites, and include in the updated schedule submitted with the Preferred Schematic Report, the timeline associated with filing with the Massachusetts Historical Commission ("MHC") and obtaining MHC approval prior to construction bids. The District should keep the MSBA informed of any decisions and/or proposed actions and should confirm that the proposed project is in conformance with Massachusetts General Law 950, CRM 71.00.

4) The information provided indicates Acton's R-2 Zoning District has a 36-foot maximum height restriction. The table included indicates the Douglas/Gates consolidation project, at approximately 42 feet, would require relief. In subsequent submittals, detail the approach and timeline necessary for obtaining this variance and/or applicability of the Massachusetts General Law Chapter 40A, Section 3 "Dover" Amendment. In addition, describe any impact this height may have on abutters, and any community concerns that may have arisen from this issue.

The submittal does not address any development restrictions outside of potential zoning. Provide a narrative indicating any potential conservation commission development restrictions including but not limited to flood plains, wetlands and associated setbacks, wellhead protection zone, priority wildlife habitats, and vernal pools.

Provide a narrative in response to these comments that describes any permitting, buffers, or developmental restrictions related to the Mary's Brook perennial stream on the Conant site.

6) The submittal includes no information regarding an initial evaluation of Architectural Access Board rules and regulations and their application to a potential project. Provide this information in the Final Evaluation of Alternatives in the subsequent Preferred Schematic Report. Please acknowledge.

7) The MSBA notes the following:

- The electrical narrative does not note the condition of the Photovoltaic system at the Douglas School. Provide a brief narrative describing its condition, and the potential for reuse. This narrative also notes that there are no Area of Rescue assistance call boxes at elevator lobbies in the Douglas School. However, a review of the existing floor plan does not indicate any elevators. Please clarify.*
- The systems narratives for all three schools indicate at minimum boiler plant and unit ventilator upgrades and replacements in 2007 and hot water heaters in 2009/2010 with these components still being in excellent condition. Provide a list of equipment that the District could consider salvaging and reusing, if new construction is the preferred solution. Refer to the note below regarding recovery of previous grants relating to recent projects. Please acknowledge.*

- *The plumbing narrative in the existing conditions for each school notes that the sanitary sewer system is connected to the municipal sewer system. However, the existing condition site plans and the site development requirements each note an area for a leeching field and an onsite septic system. In response to these review comments, clarify and update the existing conditions analysis in the subsequent Preferred Schematic Report.*
- *The plumbing narrative for each school notes a recommendation to do testing for lead levels in the domestic water. Provide any updated information regarding this recommendation.*
- *The fire protection narrative notes that a hydrant flow test will be required to determine the need for a fire pump. Provide a schedule of anticipated activities.*

8) *The MSBA notes the following:*

- *The information provided in the Hazardous Materials Determination Survey performed by Universal Environmental Consultants (“UEC”) indicates the presence of Underground Storage Tanks (“UST”) at all three sites. UEC states that no records were available to review the size or condition of the tanks. Additionally, all three Phase I ESA indicate a possible release of petroleum from fuel oil USTs on the sites. The ESAs also report the sites have indications of a possible release of hazardous substances or petroleum products (“HSP”). However, the Phase I ESA for the Gates site provides documentation of disposal for the UST previously located at the site. In the District’s response to these review comments and in subsequent submittals, clarify these conflicting findings by providing all available records for the disposal of USTs at the sites. Subsequently, if no such documentation exists, provide a detailed plan and timeline associated with a thorough site investigation to determine the location of any existing USTs, or that the USTs were in fact removed. Subsequent submittals should also indicate a plan of action in response to possible soil contamination if the release of HSPs is confirmed and will affect excavation activities. Note that all costs associated with the removal of underground storage tanks, as well as any special waste or hazardous or contaminated materials remediation, removal and disposal where associated with site work are categorically ineligible for MSBA reimbursement and should be itemized on all submitted cost estimates.*
- *Preliminary soils and geotechnical evaluations identify the expected soil types on site, as determined by the USDA Soil Conservation Service, and the U.S. Geological Survey Bedrock Geologic Map of Massachusetts. In response to these comments and in all subsequent submittals, detail the anticipated subsurface explorations to be performed to obtain further information. Note that geotechnical surveys should be a determining factor in choosing the location and configuration of the proposed school, and the District’s preferred design option.*
- *The summary of methods and assumptions notes that field investigations for subsurface soil conditions are planned for the Schematic Design Phase, after a building location and site are chosen. Confirm that adequate information will be collected before determination of the District’s preferred design option in order to make an informed decision. Please acknowledge.*

9) *The information provided includes the Phase I ESAs that have been performed for all three Project Sites. In response to these comments provide a plan and timeline for performing Limited Site Investigations, as recommended, on all three sites to verify that the areas in the vicinity of the former USTs and septic systems are free of contamination. Additionally, detail the anticipated investigations to confirm what was described in the Gates school Phase I ESA as a*

previous 2002 release of diesel fuel identified by Release Tracking Number 2-14590, that no contamination remains or is anticipated to affect excavation activities. Confirm that the recommendations identified in these assessments will be addressed in subsequent phases of the project.

10) The information provided in the Hazardous Materials Determination Survey performed by UEC indicates the presence of asbestos containing materials throughout the buildings. It should be noted that all costs associated with the abatement and replacement of asbestos-containing floor and ceiling tiles are categorically ineligible for MSBA reimbursement and should be itemized on all cost estimates provided. As noted above, the reports indicate the prior presence of Underground Storage Tanks (USTs) at all three sites which also are categorically ineligible for MSBA reimbursement and should be itemized in the cost estimates provided with the Total Project Spreadsheet provided with the Project Scope and Budget submittal. Please acknowledge. In addition, the MSBA notes that these reports were included in the appendices with no reference to them in the appropriate existing conditions sections. In future submittals, reference the findings of these reports in the relevant sections of the submittal.

The plumbing narrative for each school notes that the original piping insulation is possibly asbestos and should be evaluated for abatement, however, the hazardous materials reports did not appear to include testing of this insulation. In addition, the assumption was made that PCB's are present in the building materials and caulking without testing. Describe what testing will be performed to inform local decisions.

11) Although references are made to the 2014 Dore & Whittier Existing Conditions and Master Planning Development Study, a copy of this study is not included in the submittal and the electronic link provided is not functional. In response to these comments, provide a hard copy of this study, as well as a summary of information from this study which informed the PDP submittal.

No further review comments for this section.

3.1.5 SITE DEVELOPMENT REQUIREMENTS

Provide the following Items		Complete; No response required	Provided; District's response required	Not Provided; District's response required	Receipt of District Response to be filed with MSBA Staff
1	A narrative describing project requirements related to site development to be considered during the preliminary and final evaluation of alternatives.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	Existing site plan(s)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

MSBA Review Comments:

Various portions of the submittal narratives include conflicting, uncoordinated, and unedited text, including references to Harvard Hildreth Elementary (pages 154 and 161). In addition, there are images referenced, but no image provided. In future submittals, ensure a review of the accuracy of the submittal. Please acknowledge.

1&2) The MSBA notes the following:

- The information provided includes a list of 3 potential site options currently under consideration. The information indicates the Douglas and Gates sites are within a 100-

year floodplain, and all three sites are impacted by Acton's 75-foot wetland buffer zone. In subsequent submittals, provide site plans that indicate these limitations and detail the approach for considering development inside of the 100-year floodplain and Acton's 75-foot wetland buffer zone. In response to these comments, indicate how the Conant site is not located within a 100-year or 500-year floodplain, as noted, while the provided image on page 160 depicts the 100-year floodplain appearing to cross the property boundary in two locations. Describe any potential design mitigation considerations for both the site development and building design in response to these site conditions.

- In subsequent submittals, provide all information regarding the expected use/alteration of and approvals relating to existing septic systems and associated leaching fields, etc. Note that all work beyond the school property line, and scope associated with any onsite septic system will be considered ineligible for MSBA reimbursement.
- The site narratives note that there are an inadequate number of parking spaces currently onsite without indicating the current number or how the appropriate proposed number of spaces was determined. In the District's response to these comments, describe the rationale used to determine the proposed number of parking spaces (e.g. number of staff and visitors, zoning requirements, etc.).
- The Douglas/Gates site narrative related to athletic fields/ outdoor space notes a neighboring playground outside of the property bounds, and that there are basketball courts that are used by the community. The Conant site narrative related to athletic fields/ outdoor space notes a neighboring ball field outside of the property bounds. No documentation or narrative explaining the extent of current onsite athletic fields/ outdoor space at either site is included. Provide related onsite information as required and clarify any arrangements with the community for future use of offsite outdoor spaces by the proposed school.
- The Gates School site narrative notes that it is bordered on the west by the MBTA Commuter rail train tracks. In response to these comments, provide a description of any impact this adjacency would have if this site is selected, and any mitigating factors that could be employed.

No further review comments for this section.

3.1.6 PRELIMINARY EVALUATION OF ALTERNATIVES

	Provide the following Items	Complete; No response required	Provided; District's response required	Not Provided; District's response required	Receipt of District's Response; To be filled out by MSBA Staff
1	Analysis of school district student school assignment practices and available space in other schools in the district	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Tuition agreement with adjacent school districts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Rental or acquisition of existing buildings that could be made available for school use	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	Code Upgrade option that includes repair of systems and/or scope required for purposes of code compliance; with no modification of existing spaces or their function	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Provide the following Items		Complete; No response required	Provided; District's response required	Not Provided; District's response required	Receipt of District's Response to be filled out by MSBA Staff
5	Renovation(s) and/or addition(s) of varying degrees to the existing building(s)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	Construction of new building and the evaluation of potential locations	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7	List of 3 distinct alternatives (including at least 1 renovation and/or addition option) are recommended for further development and evaluation.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

MSBA Review Comments (refer to the general comments above):

1) *Not provided. As noted in the enrollment letter dated January 18, 2018 the MSBA's study enrollment recommendations are based on an assumption of full utilization at all of the school facilities, and notes that if a consolidation option is chosen, the District will be required to establish the proposed future use or disposition of any existing spaces vacated or reprogrammed as part of this project. As noted elsewhere in this review, this applies for both the existing Pre-K capacity, K-6 capacity, and any other grades effected by the potential projects considered for this study. In the District's response to this review, provide all information regarding Acton-Boxborough's District-wide capacity.*

2,3) *Not addressed. Provide in response to these comments.*

4) *The information provided includes a determination that the Base Repair (a.k.a. Code Upgrade) Option 1 does not provide educational improvements necessary to meet the District's Educational Program. The District has stated that it will provide information for a Base Repair for cost comparison purposes in future submittals. Please confirm.*

5) *The information provided indicates that a single addition/renovation option of the existing Douglas facility was explored. However, no addition/renovation options for either the Gates or the Conant Schools were included. In response to these comments, provide at minimum an equal level of analysis for addition/renovation options for the Gates and Conant sites, with the appropriate enrollment options, including preliminary level cost information, and conceptual site "test-fit" block diagrams. Provide a narrative as required describing the extent that these other addition/renovation configurations meet the needs of the District's educational program.*

6) *The MSBA provides the following review comments:*

- *The MSBA notes that the feasibility study for this project includes three study enrollment options. The MSBA expects the scope of this feasibility study to include an evaluation of the 650-student single school option along with the two consolidated school options. It should be noted that no new construction option associated with a 650-student enrollment was included as part of the preliminary evaluation of alternatives, based on a local desire for a twin school. The MSBA expects the scope of the feasibility study to include this option for District evaluation. In response to these comments, provide at minimum a new construction option on the existing site for 650 students with a similar level of analysis as the other new construction options, including preliminary level cost information, conceptual diagrams, and initial space summary.*

- *In response to these comments, detail any potential schedule delays relating to site approvals for the Elm St. playground as part of Option 3, considering the stated uncertainty of the Elm St. playground site's availability for development. Additionally, as part of the Preferred Schematic Report, include information regarding the investigations performed in regard to this site including legal ownership, development restrictions, and any soil investigations conducted.*
- *Describe permitting requirements, costs, and schedule impact statements if the District wishes to consider renovations or alterations to the walking bridge on the Douglas/Gates site.*
- *Each of the New Construction options note a disadvantage that a change in location may affect the District open enrollment student distribution. In response to these comments, provide a narrative explaining how the open enrollment may be affected, any pros and cons for each scenario related to the change, and any mitigating factors that could be considered.*

7) *The information provided proposes the following options for further consideration in the Preferred Schematic Report:*

- **Option 1 Base Repair**; *Base Code upgrade of the existing Douglas facility.*
- **Option 2 Douglas School Addition / Renovation**; *Addition/renovation of the existing facility for 650 students.*
- **Option 3 Douglas and Gates New Construction on Douglas Site**; *New building located on the existing Douglas and Elm St. playground site for 990 students.*
- **Option 4 Douglas and Gates New Construction on Gates Site**; *New building located on the existing Gates site for 990 students.*
- **Option 5 Douglas and Conant New Construction on the Conant Site**; *New building located on the existing Conant site for 1,015 students.*

All options being considered for further evaluation are being proposed on the three existing sites, with Option 3 being contingent on the acquisition of the Town of Acton's Elm St. Playground site. Preliminary project costs for these options range from \$13 to \$124 million.

In response to these comments, provide an updated list of alternatives to be further developed in the Preferred Schematic Report, and a detailed description of any alternatives not considered for further study. Provide information that details the determining factors leading to the District's decision that each of the options not included are not viable. Provide as much detail as required to present a compelling analysis that these options should not be carried forward into the following preferred Schematic Review submittal, including, if necessary, existing building capacity analyses, site plan "test fits", comparative cost data, or any other information that shows that the conclusions made to date are valid. Please note the Final Evaluation of Alternatives must include at least one addition/renovation project for each site that is proposed to include a new construction option.

No further review comments for this section.

3.1.7 LOCAL ACTIONS AND APPROVAL

Provide the following Items		Complete; No response required	Provided; District's response required	Not Provided; District's response required	Receipt of District Response Required
1	Certified copies of the School Building Committee meeting notes showing specific submittal approval vote language and voting results, and a list of associated School Building Committee meeting dates, agenda, attendees and description of the presentation materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	Signed Local Actions and Approvals Certification(s):				
	a) Submittal approval certificate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b) Grade reconfiguration and/or redistricting approval certificate (if applicable)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	Provide the following items to document approval and public notification of school configuration changes associated with the proposed project				
	a) A description of the local process required to authorize a change to the existing grade configuration or redistricting in the district	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b) A list of associated public meeting dates, agenda, attendees and description of the presentation materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	c) Certified copies of the governing body (e.g. School Building Committee) meeting notes showing specific grade reconfiguration and/or redistricting, vote language, and voting results if required locally	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	d) A certification from the Superintendent stating the District's intent to implement a grade configuration or consolidate schools, as applicable. The certification must be signed by the Chief Executive Officer, Superintendent of Schools, and Chair of the School Committee	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

MSBA Review Comments:

2b, 3) If the Preferred Solution in the following Preferred Schematic Report is one of the consolidated school options, provide the above documentation as part of that report.

No review comments for this section.

3.1.8 APPENDICES

Provide the following Items		Complete; No response required	Provided; District's response required	Not Provided; District's response required	Receipt of District's Response; To be filled out by MSBA Staff
1	Current Statement of Interest	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2	MSBA Board Action Letter including the invitation to conduct a Feasibility Study	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	Design Enrollment Certification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

MSBA Review Comments:

In response to these comments, and in all subsequent submittals, provide all information and materials that were developed and used to make determinations as part of the feasibility study. This information should be provided either directly in the submission's relevant section or as part of the submission's appendices. Note that critical documents referenced on various websites do not meet this requirement.

No further review comments for this section.

Additional Comments:

Regarding past projects, both the MSBA's enabling legislation, M.G.L. c. 70B, and the MSBA's regulations, 963 CMR 2.00 et seq. specifically address the issue of past projects. MSBA records show that the MSBA provided the Acton-Boxborough School District (paid to the town of Acton) a grant of \$206,660 for a roof project at the CT Douglas school, and \$229,818 for a boiler project at the Luther Conant school. Pursuant to these requirements and depending on the District's ultimate plan for the Douglas ES project, the MSBA will recover a pro-rated portion of the financial assistance received for previous renovation grants. The exact amount recovered will be established at the conclusion of the Schematic Design / Total Project Budget phase. See the MSBA website to view the MSBA's regulations, statute and closed school bulletin for additional information.

End