November 10, 2026

Ref: 14867.07

Neil Angus, FAICP, LEED AP
Director, Devens Enterprise Commission
33 Andrews Parkway
Devens, MA 01434

Re: CFS-4 Amendment Application

Dear Neil Angus:

Vanasse Hangen Brustlin, Inc. (VHB) respectfully submits this letter in response to comments received from Devens Enterprise Commission, dated October 30, 2026. Comments are reiterated below with VHB responses following in italic.

## CFS 4 NOTES MODIFICATION MARK UP COMMENTS:

### CFS 4 NOTES MODIFICATION MARK UP 1 & 2

Comment 1. Please explain why the significant grading impacts are shown in these areas. What opportunities are there for minimizing areas of disturbance and tree removal? (note: for location one it shows changes to grading, but landscape plan shows existing vegetation to remain).

*Response:* *Area 1 does not contain any proposed grading and is outside of the limit of work. Area 2 is grading associated with the construction enabling plan, under separate approval. An additional graphic is included in this response to help clarify the limit of work.*

### CFS 4 NOTES MODIFICATION MARK UP 3 & 4

Comment 2. These utility yard areas seem to have a lot of open space. Is it possible to reduce the size and tighten up the area of disturbance?

*Response:* *The utility yards are similar in size to the previously permitted plans. CFS requires these areas for equipment and utility infrastructure, materials processing, vehicle maneuverability, outdoor storage, and other uses that cannot be depicted on the site plans at this time as they are still being developed by CFS.*

### CFS 4 NOTES MODIFICATION MARK UP 5

Comment 3. Why is a relatively flat lawn area proposed here? If more soil would be located here it could reduce the area of disturbance in other areas.

*Response:* *Area 5 is associated with the construction enabling plan, under separate approval. This area will be used for construction trailer laydown and electrical infrastructure. Also please note that, while slightly expanded, this area was always intended to be grass lawn as it is located over an existing stormwater*

*chamber system built during the CFS-2 project. An additional graphic is included in this response to help clarify the limit of work.*

## DEC STAFF COMMENTS:

Comment 1. A copy of the LEED Green Building Rating System Project Checklist will need to be provided as part of building permit application for interior fit-up.

*Response:* *Any remaining items pertaining to the LEED scorecard will be submitted at the time of building permit application.*

Comment 2. Provide an updated zoning table for our review, including existing, previously permitted, and proposed. The table should include land area disturbed, total impervious area, building coverage, porous surfaces, parking, etc.. This and the IPS notes will need to be included on the final plan set.

*Response:* *The zoning table from the original permit application has been updated and included with this comment letter. Regarding the Industrial Performance Standard (IPS) notes: the permit amendment package only included the specific revised plan sheets requested by Neil Angus. The IPS notes are still present on Sheet C1.01 (Legend and General Notes) in the full plan set and have not been modified since approval.*

Comment 3. There appear to be some large open areas within the footprint where nothing is proposed (see attached marked-up plan). Are there opportunities to further reduce areas of impact/grading beyond the perimeter driveway, as well as utility yards? Could some of these areas be used to re-direct excess material and reduce stockpile limits on the inset area and at Oak Street?

*Response:* *See previous responses on plan markups.*

Comment 4. Please include a note on the erosion and sediment control plan and landscape plan highlighting the importance of tree protection near the driveways and limits of disturbance, including care required to avoid damaging roots.

*Response:* *The following notes have been added to the plans regarding excavation within roots zones to remain. These notes cover all areas of disturbance (not only near driveways) and match the notes from the approved CFS-3 plans:*

*"Excavation within root zones of trees to remain shall be performed by established methods designed to reduce damage to the roots and increase long-term survivability, such as:*

- *Hand-digging: allows for more controlled precision when digging in and around critical roots, and reduces accidental severing of roots. Gently remove soil, working slowly. Keep exposed roots most until they are protected or pruned.*
- *Air excavation (air spades): utilize compressed air to blow away soil without cutting roots. Leaves roots intact.*
- *Vacuum excavation: uses suction to remove soil without contact with the root."*

Comment 5. Please include the previously approved limit of work as a red-line on the new site layout plans. With the reduction in scale of this project, there should be no major expansions to the limits of work.

Expansions for grading should be minimized to preserve existing vegetation with the use of retaining walls where feasible (as per the original approved plans).

*Response:* *An additional graphic has been provided to clarify the limit of work. The perceived expansion of the limit of work is associated with the construction enabling plans, under separately approval.*

Comment 6. Lighting levels are high in some areas adjacent to the facilities. Lighting plans do not appear to include lighting that will be needed for the exterior equipment, stacks, stairs, and platforms associated with this project. 974 CMR 3.04(6)(a)3. and 974 CMR 4.04 allow for 0.5 footcandles. While it is understandable that some increased light levels may be necessary within utility areas, these lighting levels should be brought down. All efforts to minimize excessive exterior lighting levels should be considered to avoid light pollution and potential nuisance conditions and comply with 974 CMR 3.04 and 4.04.

*Response:* *The revised photometrics plan is very nearly identical to the approved photometrics plan with regards to scope, fixture selections, fixture placement, and light levels. The approved plans satisfied multiple rounds of DEC staff and Nitsch peer review comments, including comments regarding exterior equipment similar to the above. Please refer back to the applicant's responses to previous comments for more information.*

*The light levels across the site have been generally reduced from the approved plans. Where the previous plan had multiple areas exceeding 4.0 foot-candles, the revised plan has no areas exceeding even 3.0 foot-candles. We believe the revised photometrics complies with all criteria previously established through the Level 2 permitting process. The Applicant respectfully requests additional explanation to help understand the nature of this comment and if this iteration of the site layout requires additional light mitigation measures above and beyond the original design.*

Comment 7. Sound study: The updated sound study was submitted on October 28, 2026 and is currently being reviewed. We will forward any additional comments as soon as they are available.

*Response:* *Noted; no response required.*

Comment 8. Height of facility. The updated configuration has modified the height of the facility. Please provide a description of the proposed revision and how it complies with the DEC's height requirements in the Devens Bylaws. Please note the proposed color of the acoustical screening and evaluate the height in comparison to the proposed CFS-3 building and the potential for visibility to the east (update previous Visual Impact Assessment if top of facility will be visible above CFS-3).

*Response:* *An isometric view of the CFS-4 building has been submitted with these comments, with additional annotations regarding building height compliance. Note that the tallest structure on the site is the open-air steel support structure for the air-cooled condenser units. This structure is not an occupied building, nor does it have walls or a roof that meets the definition in the Devens regulations. The condenser itself sits on open steel supports and is surrounded by sound-attenuating appurtenance walls. Based on our interpretation of the zoning regulations, the nearest definition of a roof on this structure is the top of the condenser unit itself, which falls below the 75-ft building height limitation.*

*Devens Density and Dimensional Regulations exclude appurtenance structures from building height regulations provided they do not exceed the building height by more than 25%. With the building height established as the top of condenser at 74.9 ft, this provides an allowance of 18.72 ft for appurtenance*

*structure exceedance. The top of the sound-attenuating walls are at a height of 85.75 ft; this exceeds the building height by only 10.85 ft, which falls below the 18.72 ft zoning allowance.*

*Also please note that, while the air-cooled condenser structure is technically taller than previously presented when calculated based on average grade plane, the average grade plane itself at the base of the structure has been lowered by an even greater amount. The result of this modification is that the elevation of top of the new condenser structure is lower than previously permitted by 1.35 ft. From a visual analysis perspective, with respect to the rest of the campus and Devens at large, the top of the revised condenser tower is lower in the revised design.*

Comment 9. Air Emissions: the MassDEP has issued an Air Permit for this facility and CFS has submitted a letter of Agreement to operate substantially below the permit thresholds. This letter will be included as part of the record of this amendment and will be addressed in the Findings of any decision.

*Response:* *Noted; no response required.*

Comment 10. Operations and Maintenance plan will need to be updated to include no snow storage in any infiltration systems, prohibition on 100% salt applications, and prohibition on the use of anti-coagulants for pest control.

*Response:* *Additional notes prohibiting 100% salt application and anti-coagulant pest control will be added to the O&M manual. Please note that there are no surface stormwater basins on the site, only subsurface chamber systems above which snow is permitted to be stored.*

## PEER REVIEW ENGINEERING COMMENTS:

Comment 1. The HydroCAD model indicates that the peak elevation in the 100-year storm event will reach 260.24', causing water to be 1.62' above the proposed inlet elevation of 258.62'. This condition would result in backup into upstream pipes and may resuspend solids within WQU-1. If feasible, Nitsch recommends raising the inlet elevation of WQU-1 to be at the 100-year storm peak elevation.

*Response:* *Raising the inlet elevation of WQU-1 above the 100-year peak elevation is not feasible due to the depth required by the upstream drainage network to accommodate long pipe runs, large diameter pipes, and various utility crossings, as well as the large quantity of stormwater generated by the 100-year storm creating high tailwater elevations. However, please note that the HydroCAD model shows that the pretreatment unit is not expected to experience tailwater conditions in storms up to the 50-year storm, making stormwater backup into the pretreatment unit an extremely rare occurrence. More importantly, the proposed HydroInternational unit stores solids in settling chamber located below its high-capacity bypass weir, minimizing the risk of resuspension of pollutants.*

Comment 2. The previous design included area drains in the concrete pad south of the proposed building. The amended design indicates that the landscaped area south of the pad will direct flow toward this area and the proposed area drains have been removed. While we understand that this material has been revised to a gravel pad, the Applicant should provide additional information about the base material of the pad and its infiltrative capacity, particularly due to the gravel pad's proximity to the building. Nitsch recommends further review to determine whether additional collection, such as an area drain, is needed to manage runoff.

*Response:* *Understood, this comment will be taken into consideration. The design of the gravel utility yard section and its interaction with building, wall, and equipment foundations is a construction level detail that will be developed with geotechnical coordination as design progresses. We do not believe that the presence of an area drain in this area should impact the project's permitting.*

Comment 3. Note error in detail printing on Sheet C6.03. Please update for clarity.

*Response:* *Sheet C6.03 has been reprinted and included with this response to comments letter.*

## DEVENS UTILITIES COMMENTS:

Comment 1. Working on gas utility upgrades to the site with CFS and National Grid – no other comments.

*Response:* *Noted; no response required.*

Sincerely,

VHB

Eric O'Brien, PE
Senior Project Engineer