



**IBI GROUP**  
21 Custom House Street, 3<sup>rd</sup> Floor  
Boston, MA 02110 USA  
tel +1 617 896 2500  
**ibigroup.com**

10 August 2022

**Wagner Hodgson comments provided 8/24/22**

Devens Enterprise Commission  
33 Andrews Parkway  
Devens, MA 01434

Attention: Neil Angus

Dear Neil,

Re: King Devens, LLC – 57 Jackson Road Biomanufacturing Facility and Amenity Building  
(Parcel ID# 013.0-0021-0100.0)  
IBI Project No. **122047**

King Devens, LLC - 75 Jackson Road Biomanufacturing Facility  
(Parcel ID# 018.0-0021-1000.0)  
IBI Project No. **122047**

IBI Placemaking has reviewed the second submittal for 57 Jackson Road Unified Permit Application and 57 JACKSON ROAD - SITE DEVELOPMENT PLANS and 75 Jackson Road Unified Permit Application and 75 JACKSON ROAD - SITE DEVELOPMENT PLANS.

IBI Group offers the following comments for consideration addressing general and submittal requirements per Section 3.02: REQUIREMENTS and Section 3.04: DESIGN STANDARDS. There are many additional comments to address in the Site Plan, Stormwater, and Traffic reviews provided by Nitsch Engineering.

**Applicant Response:** *Please find the applicant's responses to IBI Placemaking review comments in red italics below.*

### **974 CMR 3.0: SITE PLAN**

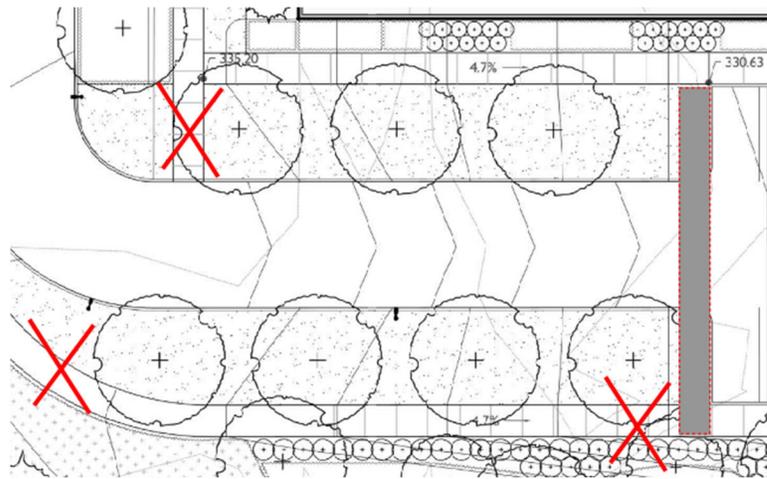
#### **General Comments**

**1. For all submitted content:**

- a. For future submittals provide searchable text PDFs for review and comment. Providing raster image documents results in longer review times and additional cost to the applicant.  
**Applicant Response:** *Searchable text PDFs will be provided in future submissions for review and comment.*

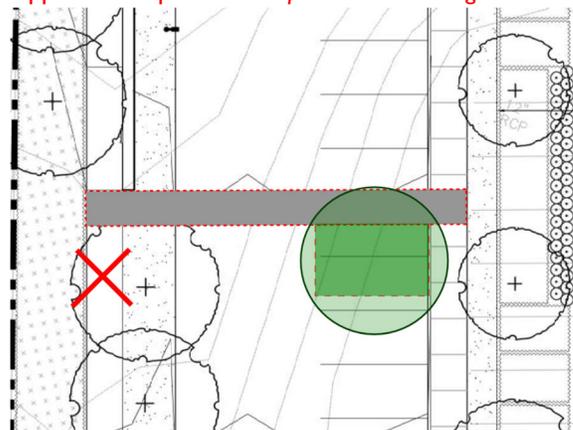
**2. OVERALL LANDSCAPE LAYOUT AND MATERIALS PLAN - L100**

- a. This is unfortunate to have three paved vehicular circulation paths all adjacent to one another heading in the same direction along Lake George Street. Consider any opportunities to consolidate vehicular circulation without introducing yet another roadway exclusively for parking along the west side of the proposed 57 Jackson building.  
**Applicant Response:** *The three separate vehicular drives must remain, since the 53 Jackson Road parcel (between 45 Jackson and 57 Jackson, owned by King Street Properties) is under separate ownership and we must maintain vehicular access that bisects the campus.*
- b. Consider removing the redundant pedestrian paving that heads northwest to the path behind the retaining wall when there is already so much paving here.  
**Applicant Response:** *The redundant pedestrian paving has been eliminated; please refer to the landscape plans.*
- c. Suggest providing a pedestrian crossing in this area to connect to the parking adjacent walkway:  
**Applicant Response:** *The pedestrian crossing has been adjusted, extending straight across the drive aisle from the southern facade of 57 Jackson (plan left) at the top of the sloping drive aisle.*



- d. And another planted pedestrian crossing at the point where the walk goes behind the retaining wall. Readjust parking layout to have equally spaced bays between the (now) two tree islands along this side of the building:

*Applicant Response: The pedestrian crossing has been adjusted per IBI suggestion.*



**3. OVERALL LANDSCAPE LAYOUT AND MATERIALS PLAN GARAGE ALTERNATIVE - L100 ALT**

- a. Provide more detailed plans, including elevations for proposed garage with the proposed planting to demonstrate any future required setbacks/screening if relying on this strategy to accommodate the required parking. *Applicant Response: In the unlikely event that the proposed garage is constructed, the design team may be back before the DEC and can provide elevations of the garage facades with planting if requested.*

**4. IRRIGATION PLAN - L400**

- a. Plan is difficult to read and search as a rasterized image. Please submit PDF format with searchable text for review and comment for future submittals. *Applicant Response: Future submissions will include plans with searchable text for review and comment.*

**5. DETAILED LAYOUT AND MATERIALS PLAN EAST – L101**

- a. Transformers typically require access from at least one side, and this seems to be the only accessible side of the equipment, which indicates planting. This would preclude maintenance access, and if omitted would leave it exposed to view from the footpath. *Applicant Response: The design team is working to finalize above-ground utility layout, including the transformer, surrounding the amenity building. Final design will ensure ease of access for maintenance.*
- b. Consider an alternative method of screening the transformer from the footpath while providing for all required access. *Applicant Response: The design team is working to finalize above-ground utility layout and screening material for all above-ground utilities surrounding the amenity building. Screening material will be noted in the final submitted plans.*

**974 CMR 3.02: REQUIREMENTS**

1. **3.02:3(a)**-Surveying and Drafting Plan Requirements. The Site Plan shall be 24"x 36" and at a scale of 1"= 40' unless an alternative scale is authorized by the Director.
  - a. Waiver administratively granted to submit 1" = 50' for 57 Jackson per Peter Lowitt email communication. *Applicant Response: The design team appreciates coordination on this waiver.*
2. **3.02:3(b)5.:**
  - a. Provide representative cross-sections of service and parking areas and driveways. *Applicant Response: The design team can coordinate a response with civil and architecture to provide these if deemed necessary as a condition of obtaining the permit.*
  - b. Please provide elevations of the retaining walls with the proposed planting to help illustrate the appearance from outside the properties. Providing some articulation to the wall in plan view could help to break up the monolithic appearance of the long lengths. *Applicant Response: The design team can provide elevations if deemed necessary as a condition of obtaining the permit, and will be developed in CDs. Wall articulation is not possible due to an adjacent existing stormwater basin.*
3. **3.02:3(b)4.and**
  - a. Provide existing and proposed Front, Side, and Rear Yard setback dimensions as an overlay on all Landscape Plans provided by Warner Hodgson. *Applicant Response: The plans have been updated to include setback information.*
4. **3.02:3(b)6.a.** Existing and proposed landscape features such as street trees, fences, walls, planting areas, wooded areas, and walks. Scattered trees to be preserved shall also be shown as well as all "specimen trees" (trees exceeding a minimum caliper of 12" within 100' of existing or proposed lot lines have been identified and indicated on the plan. All existing landscape features, especially existing trees and woodland to remain, shall be shown on ALL site plan sheets, such as site preparation and demolition, layout, grading, utilities, and erosion control, as well as planting plans. *Applicant Response: The site plans have been updated to include tree protection information for all existing specimen trees and trees to remain.*
  - a. **SOILEROSION&SEDIMENTATIONCONTROL/SITEPREPARATIONPLAN-C300**  
- Some trees larger than 12" are not shown to be removed, nor protected. Revise submittal to clarify the intent for all trees over 12" caliper within 100' of lot line. *Applicant Response: The site plans have been coordinated to include tree protection information.*
  - b. **UTILITYPLAN-C600**-It appears some trees to remain are not shown on this plan nor many other plans within the set. Ensure all trees to remain are clearly shown on all plans within the submitted materials. For planting plans, provide a legend, or a schedule indicating trees that are preserved. It is implied by a symbol, but no legend is provided. *Applicant Response: The site plans have been updated to include tree protection information and a legend.*
  - c. Provide seal and signature of landscape architect for future submittals. *Applicant Response: The site plans have been updated to include seal and signature.*
5. **3.02:3(b)6.b.**
  - a. Provide existing and proposed contours on planting plans with elevations, not just linework. *Applicant Response: The landscape plans have been updated to include proposed contours.*
  - b. Provide materials and details for site amenities and materials for items not addressed by the civil plans, such as the board formed wall, fencing, benches, stairs, etc. If the item, or the material is to be addressed by the civil, provide a legend showing the details cross-referenced to the civil documents. *Applicant Response: Details will be carried through detailed notes in the permit set and in details as the project moves into CDs, and will share continuity with 39 and 45 Jackson parcels.*
6. **3.02:3(b)6.d.**-If an irrigation system is proposed, the Submission shall include an irrigation plan complying with 974 CMR 8.09(11) showing the complete layout and of all components, complete schematic diagrams of all systems, a functional and sequential description of all systems, and irrigation details for installation of all components, including but not limited to piping, valves, valve boxes, sprinkler heads, backflow preventers, automatic control systems, pumps, meters, associated cabinets, and all appurtenances as needed. *Applicant Response: The Irrigation Plans included in the landscape set indicate intent for irrigation design; the Client is working with a third party contractor for detailed irrigation design.*

- a. **Sheet L400 IRRIGATION PLAN** – Submitted plan does not meet these requirements noted above, particularly as relates to required details for major system components. –Revise and resubmit for review and comment. **Applicant Response:** *The Client is working with a third party contractor for detailed irrigation design.*

**974 CMR 3.04: Design Standards**

1. 3.04:1.
  - a. Provide existing and proposed Front, Side, and Rear Yard setback dimensions as an overlay on all Landscape Plans provided by Wagner Hodgson. **Applicant Response:** *The plans have been updated to include setback information.*
2. 3.04:3.(a)1.e.
  - a. Confirm all proposed rain garden plantings are tolerant of both urban conditions and are salt tolerant. Do not show snow storage in any area that can drain to any rain garden planting to avoid concentrations of and other road debris/chemicals, and de-icing salts that will adversely affect the rain garden plantings. **Applicant Response:** *WH will review and confirm that raingarden plantings are all urban- and salt-tolerant species, and make revisions if necessary.*
3. 3.04:3.(a)1.h.
  - a. Consider providing a shade structure for the bicycle parking or demonstrate the building overhangs are sufficiently low enough to provide effective cover from rain and snow events. **Applicant Response:** *WH will review and consider covered bicycle parking on both the 57 and 75 sites.*
4. 3.04:6.(a)1.d.
  - a. Confirm all paving materials comply with the required SRI values for all plaza areas greater than 20 square feet. Open grid pavement systems of minimum 50% pervious area are an acceptable alternative. **Applicant Response:** *All unit pavers proposed across the site are both permeable and when averaged meet the required SRI values. Concrete areas (pigmented and non-pigmented) are designed to meet required SRI values on balance.*
5. 3.048.(c)
  - a. *Tilia americana* and *Acer rubrum* are sensitive to road salt and should not be used within the parking areas. **Applicant Response:** *Tilia americana and Acer rubrum are proposed away from roadways and are located behind retaining walls separating the trees from roadways or in conservation areas.*
  - b. *Amelanchier* are not appropriate in the parking areas as shade trees. Select an appropriate tree with a larger canopy to provide shading of the pavement. **Applicant Response:** *WH will review all proposed parking area shade trees (species, sizing, and growth habit) against turning radii of delivery vehicles.*
6. 3.048.(c)5.
  - a. Increase the size of all deciduous trees to minimum of 3" caliper. **Applicant Response:** *Sizing of deciduous trees shall be 3" caliper minimum near buildings and around parking lots, and accessory smaller trees will be provided for screening and conservation areas per confirmation by the DEC.*
  - b. Confirm all shrubs meet the height requirements by including the minimum required height in the planting schedule. **Applicant Response:** *Plans updated to include shrub height information.*
7. 3.048.(d)4.-7.
  - a. Call for tree protection of all existing trees to remain on all plans with keyed symbols tied to a tree protection detail. **Applicant Response:** *Plans updated to include key and tree protection information.*
  - b. Provide a tree protection detail, calling for the placement of tree protection fencing a minimum of 12" beyond the dripline of trees. **Applicant Response:** *Plans include tree protection detail.*
  - c. Revise the tree protection note on C300 to call for the placement of tree protection fencing a minimum of 12" beyond the dripline of trees. This will affect the noted Limit-of-Work line and the extent of the tree protection zones depending on the extent of the tree canopy overhang. **Applicant Response:** *Tree protection will extend only to the limit of work @ property line.*
  - d. Show approximate tree canopy diameter of the trees to be protected to indicate the true extent of the protection limits required. **Applicant Response:** *Plans include approximate limit of tree drip lines per field measurements and GoogleEarth review.*

## 8. 3.04 8.(e)

- a. The provided soil preparation notes are very generic. Additional information regarding the onsite soils' suitability as a growing medium is required. Provide recommended soil modifications required to support the proposed plant palette and stormwater mitigation strategies. **Applicant Response:** *Soil modifications for planting and stormwater will be provided via MA State soil testing agency due to site history as part of the (contaminated) Fort Devens Army Reserve.*

## 9. 3.04 8(h)3.-4.

- a. Replace the *Gleditsia tricanthos* 'Streetkeeper' with a broad canopy shade tree that produces less litter for the parking islands. **Applicant Response:** *WH will review; 'Streetkeeper' was selected as having a more upright form along roadways, but we can include 'Shademaster' which has more robust branching.*

## 10. 3.04 8.(l)

- a. Please add the proposed berming and screen planting to the provided elevations to confirm the selected planting addresses the screening requirements. **Applicant Response:** *If needed, WH can coordinate elevations with the Architect as viewed from roadways.*
- b. The proposed location of the parking garage on L100 ALT does not appear to address the need for screening of the structure. **Applicant Response:** *The parking structure has been located to be blocked by existing and proposed vegetation as well as by existing and proposed buildings to meet viewshed requirements.*

**974 CMR 3.07 Appendix A: Plant Lists and Figures**

- I. As discussed with Wagner Hodgson on 11 May 2022, if alternates to the recommended tree and shrub species are to be used, please provide some research as to the viability of the alternate selections in the locations indicated on the plans. **Applicant Response:** *WH can provide research that support the viability for alternate tree and shrub selections; or absent of available research will make modifications.*
  - a. Provide an alternate to the *Pinus sylvestris* or provide a rationale for the selection. it does not appear on any of the DEC plant lists. **Applicant Response:** *Pinus sylvestris is proposed on the 57-75 sites in keeping with the same species planted elsewhere on the Devens Pathways campus.*

Kind regards,



James Kros, RLA