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Date: 19 August 2025
Arcadis Ref: 30255527 (122047-prev.) – Task 0019
Subject: Devens Peer Review
18 Independence Drive – Proposed Building Addition
Parcel ID 026.0-0013-0600.0

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Dear Neil,

Arcadis has reviewed the preliminary submittal for 18 Independence Drive Proposed Building Addition – Level 2 Unified Permit Application Documents dated August 6, 2025, including the following supporting documents:

- 2025-08-06 Response to Arcadis.pdf
- 2025-08-06 Stamped Site Plans.pdf

Arcadis provides the following comments for your consideration addressing general and submittal requirements of Code of Massachusetts Regulations Title 974 (974 CMR) 3.00: SITE PLAN APPROVAL per Section 3.02: REQUIREMENTS and Section 3.04: DESIGN STANDARDS. Please refer to additional related comments provided by Nitsch Engineering in **9419-18 Independence Drive-LTReview2.pdf**.

Comments Related to 974 CMR 3.02: REQUIREMENTS

1. 3.(b)6.a. - Administrative Plan Requirements Landscape Treatment

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. Landscaping Plans, Planting Plans, Planting Detail sheets, Landscape Maintenance Plans, and Planting Specifications shall be prepared by a Landscape Architect registered in the Commonwealth of Massachusetts and shall bear the seal and signature of the Registered Landscape Architect who prepared them.

1. On Sheet 4, the true extent of the R&D for the site landscape is not documented. Please provide additional notes, or graphic representation of the R&D. Include these trees and the tree protection symbol on all plans with the true canopy size and update the tree protection detail (Page 7) to extend a minimum of 12" beyond the dripline of trees. Provide a description of the excavation methods within rootzones of trees to remain.

MEI Response: A note is on the plan that states "Existing Tree to be Removed (typ.)" with an X through the tree symbol. Additional X's are through all trees that are to be removed as part of this project. MEI has updated the tree protection with a circle with a thickness for more clarity and maintained the note that states "Existing Tree to be Protected for Duration of Project (typ.)". Tree protection detail has been updated to extend a minimum of 12" beyond the dripline of the tree.

2025-08-19- Arcadis comment: Tree protection detail has not been updated to extend a minimum of 12" beyond the dripline of trees. Please update detail with notes and/or graphic representation showing tree protection fencing shall extend 12" beyond the dripline of trees.

2. The tree protection lines are not accurate as shown on the plans, as the construction of driveway access along Independence Drive cannot be accomplished without cutting through an existing right of way street tree. Adjust the limit of tree protection line and identify means of tree protection to remain in place for the duration of the project on all plans.

MEI Response: The tree protection line and note have been updated as stated above. One tree will be lost along Independence Drive as part of the proposed project.

2025-08-19- Arcadis comment: Location of existing street tree to be removed due to construction of driveway access along Independence Drive is not shown on plans. Please add additional notes or clarify the graphic representation for removal of existing street tree.

3. Existing tree sizes are not shown on the plans; identify all trees over 12" within 100' of the property line and indicate the true canopy size of all trees to remain.

MEI Response: Trees along Saratoga Boulevard will be lost as part of the construction of the parking area and adjacent earth berm. The earth berm will be landscaped as shown in the Plan Set.

2025-08-19- Arcadis comment: Defer to DEC for response.

4. Provide a Limit of Work on all plans that accurately reflects the maximum limit of disturbance during construction that does not extend to within 12" of the dripline of any trees to be protected for the entire duration of the construction activities, including those within the right of way to be protected.

MEI Response: MEI believes that the Limit of Work line accurately reflects the proposed development. As stated above the referenced trees will be protected for the duration of the project.

2025-08-19- Arcadis comment: Defer to DEC for response.

Comments Related to 974 CMR 3.04: Design Standards

1. 3. Parking.

Consider widening the parking-adjacent walkway that leads to the proposed building entry to be 6' or greater. There are no curb stops shown in the parking stalls (assumed to be for ease of snow removal), and overhanging car bumpers and hitches will encroach upon the desired 5' clear sidewalk.

MEI Response: Curb Stops have been added to the Layout Plan to Limit the overhang of vehicles on the sidewalk. There will still be an excess of 36" as required by 521 CMR 22.00.

2025-08-19- Arcadis comment: Change is noted.

2. 6.3. Lighting. Site lighting shall conform to the Industrial Performance Standards (974 CMR 4.04).

Lighting posts, fixtures, and housing shall be uniform dark earthtone colors and comply with the following:

- a. Access Road/Parking lighting shall be 0.5-foot candles minimum (maintained), with 30' maximum height posts.
- b. Walkway lighting shall be 0.5 foot candles minimum (maintained), with 15'-18' high posts.
- c. All lighting shall be metal halide (HID), Compact Fluorescent (CFL) and/or Light Emitting Diode (LED).
- d. Bollard lights shall have roof optics with 100% sharp cut-off or shall have, at a minimum, louvered lenses, providing maximum cut-off and be of a single dark earth-toned color. Refer to Figure 1 for examples of acceptable fixtures vs. unacceptable fixtures.
- e. Site lighting plan shall indicate location of proposed/existing trees to demonstrate that there is no conflict between proposed lights and proposed/existing trees within the site.
- f. Commercial and industrial property lights may only be illuminated between 11 p.m. and 7 a.m. if the DEC determines lights are needed to ensure safety for night operations on the premises. This requirement does not apply to residential properties.
- g. Lighting plans shall incorporate energy efficiency measures to the maximum extent feasible, including but not limited to LED Lighting, timers, daylight sensors and higher albedo ground surfaces/treatments to reduce number of fixtures required.
- h. All light fixtures shall be equipped with appropriate shielding, filters, lenses, or cutoff devices required to eliminate light trespass onto any street or abutting lot or parcel, to eliminate glare perceptible to persons on any street or abutting lot or parcel and to minimize up-lighting.
- i. Lighting attached to residential structures shall not exceed the height of the eave.
- j. Street and/or Road lighting shall comply with 974 CMR 2.07(6).
- k. Outdoor light fixtures used to illuminate an outdoor advertising sign shall be in compliance with 974 CMR 6.03(1)(f) and 974 CMR 4.04.

1. Proposed/existing trees are not provided on the lighting plans.

MEI Response: Trees have been added to the lighting plan.

2025-08-19- Arcadis comment: Change is noted.

2. Some areas of parking/roadway/walkways appear to have less than 0.5 foot candles. Verify required light levels are maintained. Existing and proposed trees will also affect the lighting model.

MEI Response: The Lighting Plan has been updated to meet the footcandle criteria.

2025-08-19- Arcadis comment: Saratoga Blvd entrance appears to have less than 0.5 foot candles. Please verify required light levels are maintained.

3. Confirm whether the existing light fixtures on buildings and within the landscape are accounted for in the light levels as modeled on Sheet 9.

MEI Response: The existing light fixtures have been added to the plans but are not accounted for in the illumination model.

2025-08-19- Arcadis comment: Change is noted.

2. 8.(c)8. – Landscape Treatment

Plant material located within 20' of any road or other paved area shall consist of species recognized by the nursery, horticulture and botanical industries as being tolerant of roadway de-icing salts. (For a sample list of plants recognized as tolerant of roadway de-icing salts, see Appendix A, List II.).

1. Confirm that all affected proposed plantings conform to this salt tolerance requirement.

MEI Response: The proposed plant material are salt tolerant.

2025-08-19- Arcadis comment: Noted.

3. **8.(d) Preservation of Existing Vegetation [See also CMR 3.04(5)]**

2. All trees with a minimum 12" caliper within the setback shall be preserved. Healthy existing wooded areas within setback areas where buildings cannot be constructed shall be preserved to the greatest extent feasible.

1. Setback lines are not clearly shown/annotated, but all trees within the setback of a minimum 12" caliper must be identified on all plans.

MEI Response: The setback lines have been labeled and what trees that can be preserved have been labeled.

2025-08-19- Arcadis comment: Change is noted.

2. Clearly indicate and label the 25' setback from Property Line along Independence Drive and Saratoga Boulevard on all site plans.

MEI Response: Zoning Setback line has been added to the Plan Set.

2025-08-19- Arcadis comment: Change is noted.

3. The Applicant shall not propose topographic alteration within the root zone of any existing tree or wooded area designated as preferably preserved.

1. The Erosion and Sediment Control Plan does not indicate what are the protection requirements. Provide cross-reference to the planting plan detail for the tree protection or include on this sheet. Include these trees and the tree protection symbol on all plans.

MEI Response: The "Existing tree to be protected for duration of project" note has been revised to reference Sheet 7 for the tree protection detail. Tree protection is shown on both the Demolition Plan as well as the Landscape Plan. Similar to the comment regarding the grading, to attempt to keep the plans as clean and readable as possible, MEI recommends keeping the tree protection symbols on the Demolition Plan and Landscape Plan as shown.

2025-08-19- Arcadis comment: Defer to DEC for response.

2. This protection shall include existing trees within the parking areas to be undisturbed. Provide Limit Of Work on all pages to ensure all existing trees to remain are called to be protected or replaced.

MEI Response: The Limit of Work Line has been added to the Plan Set.

2025-08-19- Arcadis comment: Change is noted.

3. As noted above, there seems to be opportunity to preserve more of the existing trees on the site that could be utilized for screening of the proposed building addition.

MEI Response: MEI has reviewed this multiple times from conceptual development all the way through the submitted plans. Based on the client requirements and the site constraints, the proposed design limits the amount of work and trees to be removed, while providing additional landscaping on site.

2025-08-19- Arcadis comment: Defer to DEC for response.

4. All work within the root zone of existing trees to be preserved shall be carried out under the direction and supervision of a Certified Arborist. Should there be no feasible alternative, excavation for walkways, curbs, structures, and utilities within the root zones of preserved trees shall be by hand excavation until roots are encountered, bending smaller main roots out of the excavation area, and sawcutting all roots over 1" caliper. All exposed ends of sawcut roots shall be kept moist by covering the exposed ends with wet peat moss and burlap until excavation is backfilled. Existing trees that have had excavation or grade changes within their root zone shall receive crown pruning and root fertilization per the arborist's recommendations.

1. Provide a description of the excavation methods within rootzones of trees to remain.

MEI Response: Additional notes have been added to the Landscape Plan detailing excavation protocols within the tree root zones.

2025-08-19- Arcadis comment: Change is noted.

4. 8.(f)2. Groundplane Treatment

All unpaved areas with a gradient between 1:50 and 1:3 shall receive lawn planting as a minimum. Grass shall be provided using either sod, seed, or hydroseed methods, or a combination thereof. The Applicant is encouraged to limit manicured lawn areas to those immediately surrounding buildings, roads and parking lots. In all other areas, the Applicant is encouraged to propose alternative groundplane treatments such as native meadow grasses and wildflowers (For a list of native meadow grasses and wildflowers, see Appendix A, List I.).

1. What is included in the conservation seed mix and detention basin seed mix?

MEI Response: The components of each seed mix have been added to the Landscape Plan.

2025-08-19- Arcadis comment: Change is noted.

2. Provide proposed contours and their tie-in to existing contours on all plans, particularly the planting plans to better evaluate the proposed planting.

MEI Response: Adding the proposed contours to the already busy Landscape Plan would make the Plan more difficult to read. The Plan Set has a designated plan that depicts the proposed contours.

2025-08-19- Arcadis comment: Change is noted.

5. 8.(h) – Landscape Treatment in Parking Areas

2. The Applicant shall provide shade trees around the perimeter of all parking areas at a minimum ratio of one (1) tree per 25 lineal feet of parking lot perimeter. In portions of parking areas where screens are required, the Applicant shall provide shade trees along the perimeter at a minimum ratio of 1 tree per 50 lineal feet of parking lot perimeter in addition to the required screen. Trees shall appear informally arranged, rather than set in straight evenly spaced rows, unless existing trees or major site elements suggest a formal arrangement. Informally arranged trees may be clustered or grouped, if desired, as long as clusters/groups are not more than 75' apart.

1. Please explain, or diagram, how all the above guidelines are met with this submittal.

MEI Response: The proposed parking pod is shielded from the intersection of Saratoga Boulevard and Independence Drive by an earthen berm ranging from 3'-9' in height. To supplement the

earthen berm, the perimeter of the parking area, has proposed plantings in massing with a maximum spacing 75' and in a formal setting with a spacing of 25'±.

2025-08-19- Arcadis comment: Defer to DEC for response.

2. *Picea abies* may be suitable as a screening tree but does not occur on **3.07 Appendix A: Plant Lists and Figures**. Please provide a substitution.

MEI Response: A substitution for Picea abies has been provided.

2025-08-19- Arcadis comment: Change is noted.

3. Consider substitutions for the following plants listed on **Sheet 7** Plant Schedule. Although not specifically prohibited, a native selection would be a better choice if available:
 - a. *Rhododendron roseum*
Listed under 3.07 (1) List I. Native Plants - Deciduous Shrubs [current thought is they are not necessarily a native plant for MA].
 - b. *Acer campestre*
Listed under 3.07 (2) List II. Salt Tolerant Plants – Shade Trees
 - c. Colorado Blue Spruce
Listed under Listed under 3.07 (2) List II. Salt Tolerant Plants – Evergreen Trees
 - d. Austrian Pine
Listed under Listed under 3.07 (2) List II. Salt Tolerant Plants – Evergreen Trees
 - e. Japanese Black Pine
Listed under Listed under 3.07 (2) List II. Salt Tolerant Plants – Evergreen Trees

MEI Response: The species listed below are on DEC's recommended plant list and are part of the proposed planting plan.

2025-08-19- Arcadis comment: Defer to DEC for response.

4. *Parking area terminal, intermediate, and divider islands shall contain no more than 25% impervious surfaces. The remaining 75% shall be landscaped with grass or other groundcover suitable to the Director. Shrubs planted in islands shall not exceed 4' in height where they might impede vehicular or pedestrian circulation.*

1. Provide a planting plan for all parking islands.

MEI Response: The existing landscape islands that are outside of the limit of work shall remain in their current condition.

2025-08-19- Arcadis comment: Defer to DEC for response.

6. **8.(k) - Street Trees are shade trees located along a Road and/or Street.**

1. Where existing street trees are more than 50' apart on average or do not exist along a Street or Road, the Applicant shall plant street trees. Street trees shall be placed in a linear fashion along the Right-of-Way or way boundary, at a maximum spacing of 50' on center on all collectors and boulevards. The maximum spacing for all other Streets and Roads shall be 40' on center. Where the character of the site

is predominantly wooded or pastoral, the Applicant may cluster trees informally along the lot line, with a maximum of 75' between clusters of three or more trees.

2. Street trees shall be selected from 3.0[7(5) List V. Street Trees.] The Applicant may request the DEC allow other species to be utilized.

1. Please list the species of trees to remain and ensure they are appropriate to serve as street trees as indicated on Sheet 7 along Independence Drive and Saratoga Boulevard.

MEI Response: The species of the existing street trees have been labeled.

2025-08-19- Arcadis comment: Change is noted.

2. Consider alternating the species of street trees with at least two species to avoid monocultures that are susceptible to one specific disease resulting in die-off of the entire streetscape planting.

MEI Response: The species of the proposed street trees have been revised to include two different species.

2025-08-19- Arcadis comment: Change is noted.

7. 8.(I) - Landscape Treatment of Building Facades visible from Roads and/or Streets.

1. The perimeter of all commercial and industrial buildings visible from a Road or Street, the principal entrance of adjacent or abutting buildings or from the Residential or Open Space Zoning Districts shall have continuous landscape treatment in the form of shade trees, ornamental trees, evergreen trees, shrubs, or a combination thereof within 50' from the face of the building. Landscape treatment shall consist of a minimum of one (1) shade tree per 50 lineal feet of building façade, or three (3) ornamental/evergreen trees per 50 lineal feet of building façade. Trees may be clustered or grouped, if desired. All trees shall be arranged in staggered, triangulated, or informal drifts, unless available space does not permit, or unless existing vegetation is geometrically arranged or unless such an arrangement is blocking required passive and/or active solar gain

1. Screening from the open space buffer and surrounding roads will be desirable. Please explain or indicate how the above guidelines are met with only trees and very limited, or no understory planting, particularly where proposed berms are 36" or less.

MEI Response: Additional understory plantings have been added.

2025-08-19- Arcadis comment: Change is noted. Defer to DEC for response.

2. It is unlikely the proposed Conservation Seed Mix as the understory will provide year round screening.

MEI Response: Additional understory plantings have been added.

2025-08-19- Arcadis comment: Change is noted. Defer to DEC for response.

3. Consider additional screen planting at the entry/exit off Saratoga Boulevard that does not conflict with any required sight lines.

MEI Response: Additional plantings have been proposed at the entry/exit to Saratoga Blvd.

2025-08-19- Arcadis comment: Change is noted. Defer to DEC for response.

4. Provide the required sight lines on planting plans for verification.

MEI Response: Sight Lines have been provided on the Landscaping Plan. Sight Distances are provided on the Layout and Materials Plan.

2025-08-19- Arcadis comment: Change is noted. Defer to DEC for response.

8. 8.(n)2. – Maintenance.

The DEC may require a landscape maintenance and water management plan. The maintenance plan shall include but not be limited to the following:[see regulations for full list].

1. What is included in the conservation seed mix and detention basin seed mix? How is it to be established? Provide a hatch or some indication of the limits of the proposed seed mixes vs. that which will be installed as only landscape mulch to better understand the screening approach provided in this submittal.

MEI Response: The seed mixes have been added to the landscape plan.

2025-08-19- Arcadis comment: Change is noted.

2. Provide a hatch or some indication of the limits of the proposed seed mixes vs. that which will be installed as only landscape mulch to better understand the screening approach provided in this submittal.

MEI Response: Only two types of seed mixes are proposed. The conservation seed mix and the detention basin seed mix. The detention basin seed mix has been defined.

2025-08-19- Arcadis comment: Change is noted.

3. Include protocols in the landscape maintenance plan for the establishment and maintenance of the conservation seed mix and detention basin seed mix that reflect placement on steep, unmowable slopes.

MEI Response: All slopes are 3:1 of flatter. The landscape maintenance sheet outlines how to establish newly seeded areas.

2025-08-19- Arcadis comment: Defer to DEC for response.

4. Provide snow storage areas on the planting plans to ensure that plantings within the snow storage areas are tolerant of road salts.

MEI Response: Snow storage areas have been added to the Landscaping Plan.

2025-08-19- Arcadis comment: Please refer to salt tolerant plant list for plants that would be appropriate adjacent to the snow storage areas, *Tilia americana* 'Redmond' is not salt tolerant.

5. Does the existing and/or proposed building have exterior hose bibs and/or in-ground quick coupler for watering? To ensure proper establishment of new plantings, they will have to be watered on a regular schedule during the first two years after installation, and possibly longer depending on when the seed is placed.

MEI Response: No irrigation is proposed. MEI and the landscape contractor will be providing additional watering during installation.

2025-08-19- Arcadis comment: Noted.

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Director
DEC

6. Although the density of the tree planting will be useful for screening from the roads and open space, consider the 80% mature size of the proposed trees and show them at true scale in plan. Some of the proposed trees appear to be planted too closely for their ultimate size and will result in future elimination or unnecessary pruning if they are spaced correctly. This is particularly true for the parking lot and building adjacent trees.

MEI Response: The proposed plantings have been amended/reduced.

2025-08-19- Arcadis comment: Change is noted.

7. Consider a setback, or a wider flat area, at the base of all planted slopes adjacent to hardscape to help prevent plant litter and mulch from washing off into paved areas during heavy rain events.

MEI Response: There is a flat area between the building and the proposed sidewalk adjacent to the parking field to prevent plan litter and mulch from washing off into the paved areas. The landscape berms have been designed to limit the impact to the site while meeting the height requirements for the project and maintaining a 3:1 slope so they can effectively be maintained as part of the landscape maintenance.

2025-08-19- Arcadis comment: Defer to DEC for response.

As always, please contact us with any questions or comments regarding these responses related to this submission.

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