

24 October 2022

Mr. Neil Angus
Devens Enterprise Commission
33 Andrews Parkway
Devens, MA 01434

Dear Neil,

Re: Saratoga Property Owner, LLC – 35 Saratoga Boulevard Proposed Industrial Building
Parcel ID#: 021.0-0013-1600.0
IBI Project No. **122047**

IBI Placemaking has reviewed the third submittal for 35 Saratoga Boulevard Level 2 Unified Permit Application and 35 SARATOGA BOULEVARD - 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 for the third submittal of plans and responses to the second submittal comments. There are additional related comments to address in the Site Plan, Stormwater, and Traffic reviews provided by Nitsch Engineering. Applicant's provided text responses are in **highlighted text**. Current comments are listed under the heading **IBI Group - 24-Oct-2022:**

3.0: SITE PLAN

General Comments:

1. **Dates on the sheets are inconsistent throughout the set. Ensure dates are current and reconciled with all other submittal sheets.**

This has been revised

IBI Group - 24-Oct-2022:

Noted

2. **Suggest the applicant include reference to the 974 CMR criteria on the appropriate plan sheets where applicable. As one example, add reference to CMR 974 3.04 8.(d) Preservation of Existing Vegetation [See also CMR 3.04(5)] to the notes on sheet EC.1.**

IBI Group - 24-Oct-2022:

No response provided from Applicant; note appears to be provided on the plan notes.

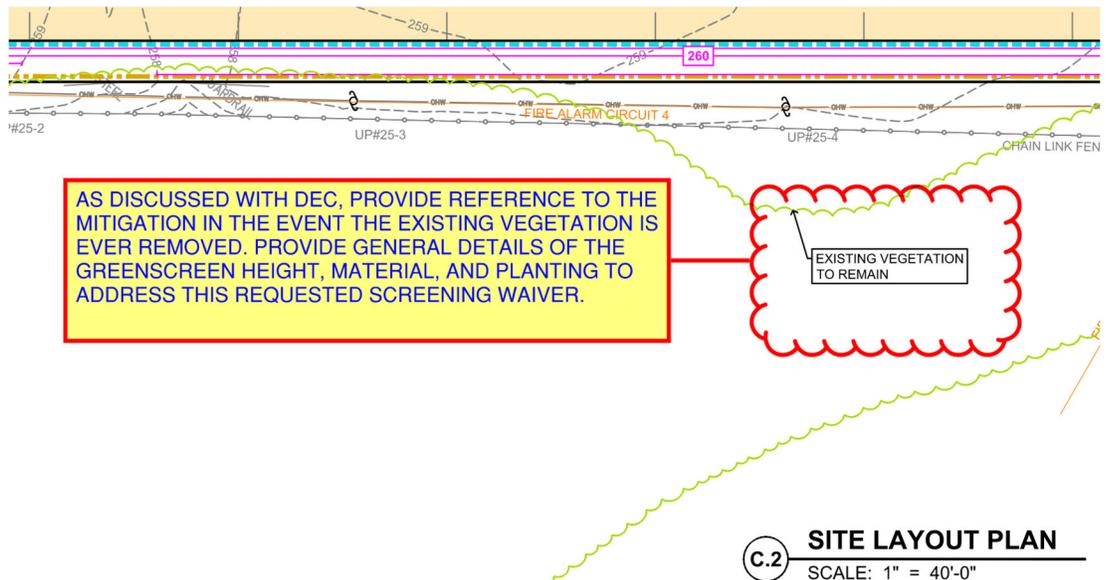
3. **SHEET A.1 - Screen plantings appear inadequate, even excepting the requested waivers. Suggest the applicant update the provided elevations with the proposed planting and grading and to address questions regarding screen planting.**

See attached project description for the waivers and added offsite plantings.

IBI Group - 24-Oct-2022:

IBI Group defers to DEC for review and acceptance of the conditions of all waiver requests. As we discussed with DEC, the Applicant should consider the following for the requested screening waivers.

For the waiver requested on the property line with DEVENS RESERVE TRAINING AREA, PARCEL F, ID # 21-13-100, see comment below regarding future mitigation:



For the waiver requested on the property line with ASA BOS, LLC, LOT 1A, PARCEL ID# 20-13-1000 and JOSEPH T. RYERSON & SON, INC., LOT 190, PARCEL ID# 21-13-400, see comments below regarding screening mitigation.

As discussed with DEC, it is unlikely the adjacent properties will not be impacted during the installation of the project. DEC suggests the Applicant discuss with the adjacent landowners how the entire edge may be used for screening, rather than ending the screening approach at the property line.

Most of the west edge of the site is graded at slopes of 2:1. An erosion control mix is called for in these areas. A 2:1 slope is too steep to maintain with the annual mowing required for establishment of these proposed seed mixes.

Given the steepness of the slopes, IBI Group recommends DEC request a Landscape Maintenance Memo to ensure establishment of the proposed plantings can be achieved for slope stabilization that does not require mowing.

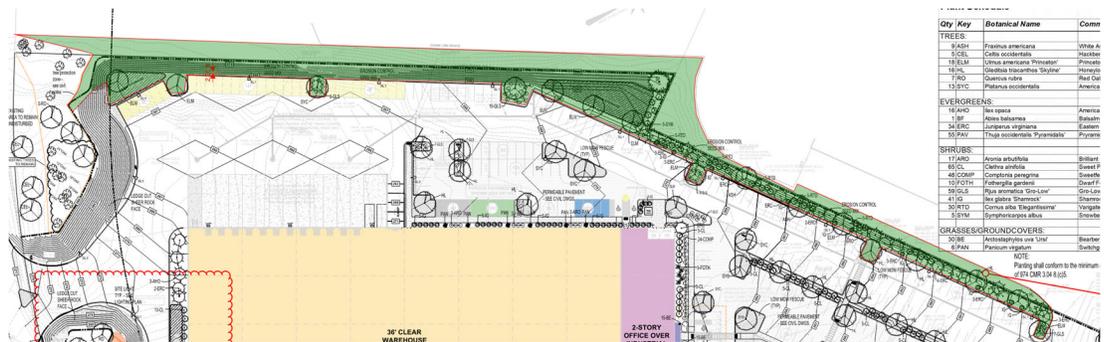
The establishment plan should consider the use of an appropriate seed mix, the planting of nut caches, seedlings, saplings, and live stakes. Ensure that the plant palette includes woodland tree and shrub species appropriate to early and future successional growth for the naturally wooded slopes at Devens such as the shrub species of blueberry, rhododendron, winterberry, bayberry, shrub dogwoods, cranberry bush, spicebush, and native viburnums.

The revised documentation should include the use of an erosion control seed

mixture, biodegradable jute mat fabric, 1” whip native trees, and shrubs of the species indicated above. The seed mixture should utilize a variety of grasses that will form a strong fibrous root system as indicated in 3.04 (8) (f) 3 to hold soil in place.

We understand the Applicant has agreed to provide an additional 30 trees within Devens as mitigation for the requested screening waivers. As discussed with DEC, these trees may better serve the project if they are to be integrated into this revised screening approach that includes the adjacent landowners.

See screen shot below from submitted sheet L.1 for the zone highlighted in green:



4. SHEET C.4.2 – SEGMENTED RETAINING WALL DETAIL - Retaining walls shall be fieldstone, fieldstone-veneer and capstones on concrete retaining wall, or flat-face interlocking concrete masonry systems with split-face texture.

The segmented retaining wall will have textured finish

IBI Group - 24-Oct-2022:

Noted

5. SHEET L.1 – LANDSCAPE PLAN - Pedestrians cannot effectively negotiate walkways adjacent to 90-degree, head-in parking without providing wheel stops to prevent overhanging vehicles. If snow removal is an issue with wheel stops, provide wider walkways to ensure pedestrians can pass by an overhanging vehicle. 6 feet is generally the minimum acceptable walkway width for this condition. Typical comment for all locations.

We have revised all sidewalks to 6 feet

IBI Group - 24-Oct-2022:

Noted

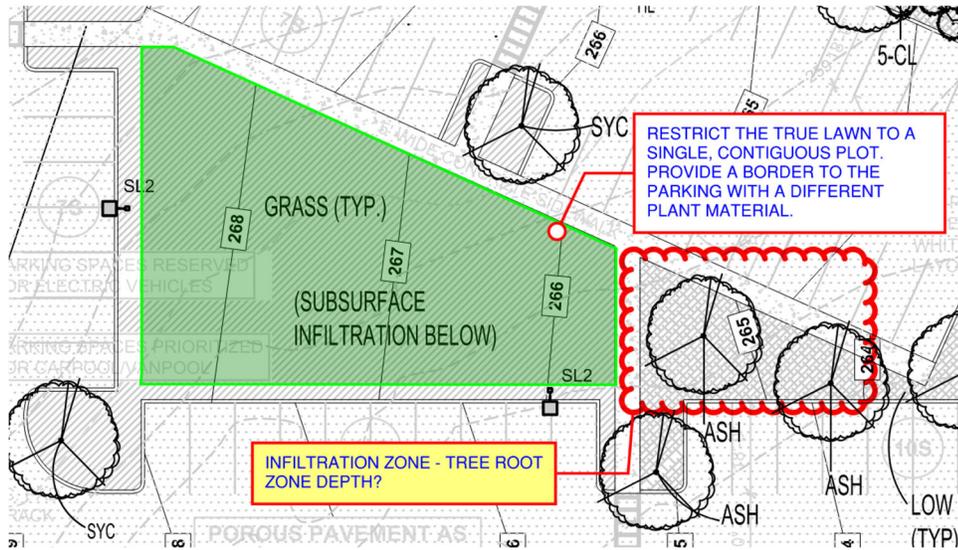
6. SHEET L.1 – LANDSCAPE PLAN – Consider combining the entries off of Barnum Road to reduce the amount of blasting required through the highest point on the site, with a mature forest canopy within the OPEN SPACE AND RECREATION ZONING DISTRICT and eliminate the redundant fire access drive.

We have combined the entries as requested

IBI Group - 24-Oct-2022:

Noted

- 7. SHEET L.1 – LANDSCAPE PLAN – Consider reducing the amount of true lawn:

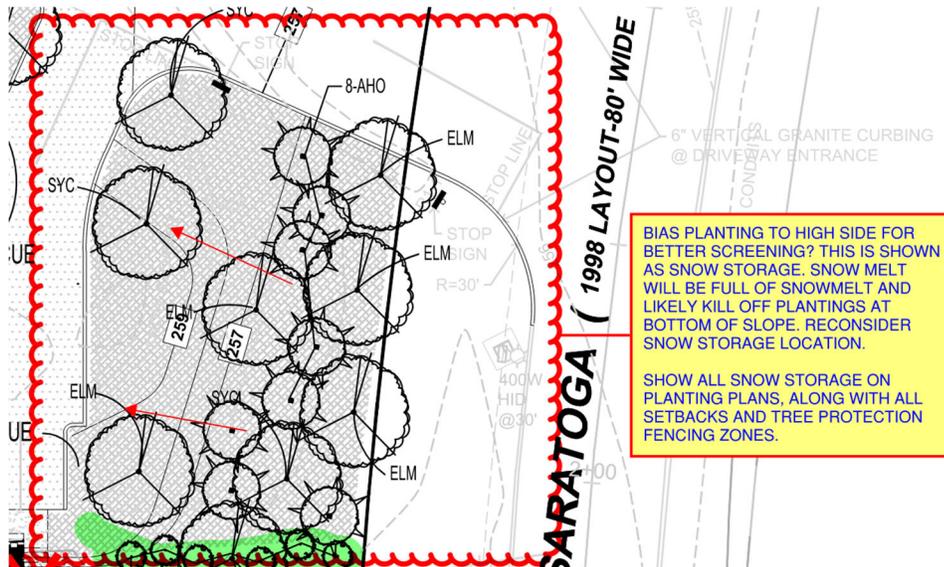


This has been revised.

IBI Group - 24-Oct-2022:

Noted

- 8. SHEET L.1 – LANDSCAPE PLAN – Consider revising the screen planting at the entry off of Saratoga Boulevard:

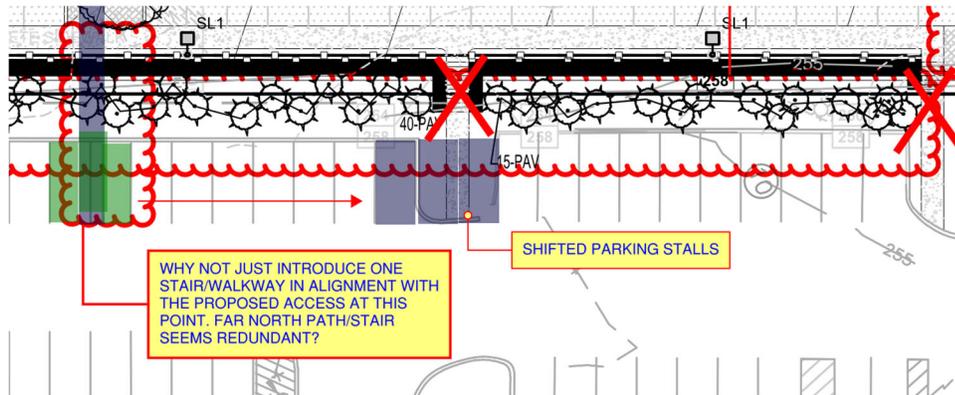


This has been revised.

IBI Group - 24-Oct-2022:

Snow storage is now indicated, but planting has not been revised.

9. **SHEET L.1 – LANDSCAPE PLAN – Consider revising the proposed pedestrian access from the neighboring property. Provide stair and handrail detailing and how to incorporate into the retaining wall, pedestrian guard rail, and vehicular guard rail:**



We have eliminated one pedestrian access point.

IBI Group - 24-Oct-2022:

Noted

3.02: REQUIREMENTS

1. **3.02 3 (b) 6 a states that “All existing landscape features, especially existing trees and woodland to remain, shall be shown on ALL site plan sheets. Trees to remain are shown on all site drawings, but are not identified as remaining on C2, C3 and L1. (See item 8)**

The plans have been revised.

IBI Group - 24-Aug-2022:

It does not appear the applicant has fully addressed this comment for all sheets.

IBI Group - 24-Oct-2022:

No response provided from Applicant

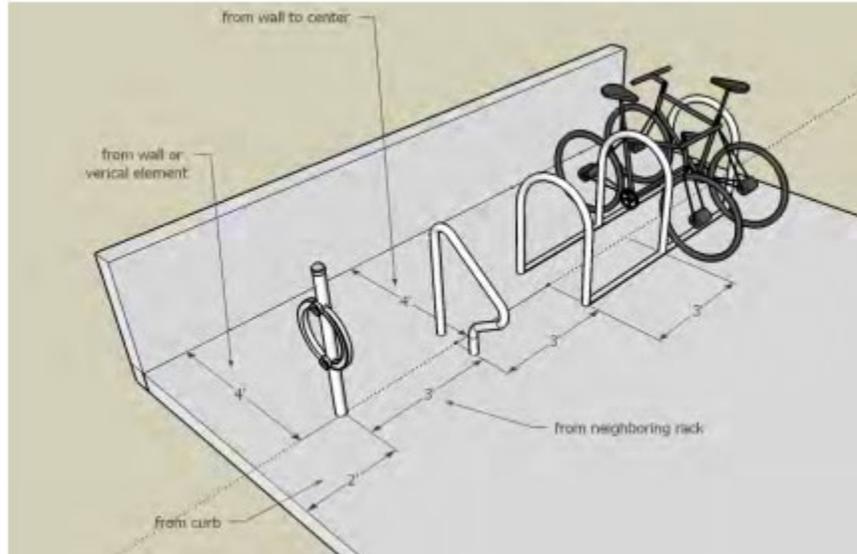
2. **3.02 3 (b) 6 b requires planting plans to indicate the locations of all proposed lighting and the dimension, materials and finishes of all walks, walls and fences.**
- The selected bike rack lacks two points of contact and results in less effective use. It is recommended that another fixture with two points of contact with the bicycle is selected.

Please clarify this comment or provide a bike rack detail you are suggesting.

IBI Group - 24-Aug-2022:

Consider placing bike racks closer to entry and covering with a structure or incorporating the entry canopy to cover the bikes during inclement weather.

See examples below for two point bike racks:



- The proximity of the drop-off at the retaining wall to the sidewalk on the east side of the large parking area creates an unsafe condition for pedestrians as well as vehicles. The addition of a pedestrian guardrail is recommended.

A guardrail and safety fence are shown on C.2

IBI Group - 24-Aug-2022:

Provide reference to the detail and specifications for the fence; none are currently provided within the set. Graphic representations of design elements do not match the linetype schedule.

The bike rack spec has been revised, A fence detail has been added.

IBI Group - 24-Oct-2022:

No guardrail detail has been provided in this resubmission.

3.04: DESIGN STANDARDS

1. **3.04 (6) (a) 1 d describes the required SRI index.**
Confirm that colorants are not being added to the concrete pavement that would affect its SRI value.

Colorants are not being added to the concrete pavement

IBI Group - 24-Aug-2022:

Noted**2. 3.04 (6) (a) 3 describes the requirements for site lighting levels and fixtures.**

- Light levels at the base of proposed fixtures are excessive. Modify the light fixtures/fixture spacing to reduce the maximum light levels to around 2.0 -2.5 fc.
- Confirm fixture colors.
- Light trespass beyond the property lines occurs at some portions of the site edges. Provide light fixture cutoffs to address this.
- Two internal islands lack the required shade tree. Inclusion of the tree will require an adjustment to the light fixtures. (See item 16)

We have revised the site lighting layout.

IBI Group - 24-Aug-2022:

Noted; provide written confirmation from the applicable Fire Safety representative that no additional lighting is required for the proposed fire access drive.

Site lighting has been revised per the new layout.

IBI Group - 24-Oct-2022:**Noted****3. 3.04 (8) (c) 2 calls for native plants.**

- *Calamagrostis* is a non-native hybrid; replace it with an ornamental native grass.
- Given the genetic diversity and associated resilience that the straight species bring to the species and ecosystem, cultivars and hybrids should be avoided where possible, especially where the cultivar has dark pigmented leaves, such as the *Physocarpus* cultivar. Replace *Platanus x acerifolia* with the native *Platanus occidentalis*. (See item 6)
- *Picea glauca*'s native range is northern New Hampshire and Vermont. Select an evergreen species for this horticultural zone.
- See item 9

See revised landscaping plan.

IBI Group - 24-Aug-2022:

It does not appear the applicant has fully addressed this comment. Provide specific reference to substitutions, or omissions, or how the comment has been addressed to avoid delays of additional submittals and reviews.

IBI Group - 24-Oct-2022:

No response provided from Applicant

4. 3.04 (8) (c) 5 describes the required sizes for plant materials.

- Increase the size of all deciduous shade trees to 3" caliper.
- Confirm all shrubs meet the height requirements.

See revised landscaping plan.

IBI Group - 24-Aug-2022:

SHEET L1. – Provide as a note, the specific reference to 974 CMR 3.04 8.(c)5. that all plant material shall conform to the minimum requirements.

Suggest applicant provide an alternate to Valley Forge Elm, due to vigorous growth and the associated required pruning and maintenance to ensure a healthy tree.

This has been substituted as requested

IBI Group - 24-Oct-2022:

Noted

5. **3.04 (8) (c) 6 calls for planting to be laid out in informal drifts.**

The arborvitae proposed for the eastern edge of the property line are planted in a single straight line, rather than a naturalistic informal drift as required. This linear arrangement is due to the insufficient space provided for planting at the property line. (See Item 14)

IBI Group - 24-Aug-2022:

Although the layout has been adjusted, the ground plane is not addressed, and this screen planting approach requires the abutter agreement to be formalized in some way to ensure any future property owners are also obligated to retain the plantings via a development easement, or other approach acceptable to DEC.

A letter from the adjacent property Owner was previously submitted to the DEC

IBI Group - 24-Oct-2022:

IBI Group defers to DEC for review and acceptance of the conditions of all waiver requests.

6. **3.04 (8) (c) 8 call for plants within 20' of a paved area to be tolerant of de-icing salts.**

- Bayberry is tolerant of coastal salt spray but may not be tolerant of road salt; use only adjacent to areas not to be treated with road salt.
- *Tilia americana* and *Acer rubrum* are sensitive to road salt and should not be used within the parking areas.
- *Platanus x acerifolia* is sensitive to road salt, however, the native *Platanus occidentalis* is tolerant. (See item 3)
- *Amelanchier* is sensitive to road salt. (See item 16)

See revised landscaping plan.

IBI Group - 24-Aug-2022:

Noted

7. **3.04 (8) (c) 11 calls for disturbed areas intended for natural re-growth to be, at a minimum, graded, loamed, and seeded.**

- Numerous areas on the site lack any indication of proposed planting or seeding. Indicate on the planting plan the extent of seeding and the proposed seed mix for all disturbed areas on the site. (See item 10)

See revised landscaping plan.

IBI Group - 24-Aug-2022:

It does not appear the applicant has fully addressed this comment. Provide specific reference to seed mix ratios, suppliers, application methods, sod vs. seed lawns, or how the comment has been addressed to avoid delays of additional submittals and reviews.

Specifications of loam to be provided and installed is not readily found on any plans.

Seeding cannot be proposed for bare exposed rock.

Please refer to the revised landscaping plan

IBI Group - 24-Oct-2022:

Noted

- 3.04 (8) (d) 4-7 describes in depth the care to be taken to ensure the survival of existing trees.
 - Call for tree protection of all existing trees to remain on all plans with keyed symbols tied to a tree protection detail.
 - Provide a tree protection detail, calling for the placement of tree protection fencing a minimum of 12" beyond the dripline of trees
 - Revise the tree protection note on EC1 to call for the placement of tree protection fencing a minimum of 12" beyond the dripline of trees.
 - Call for tree protection on the notes and detail to remain in place for the duration of all construction activities.
 - The proposed grading between the fire lane and the building result in the loss of the three oaks to remain. Adjust the 264 through 268 contours to save the trees.

This area will be blasted to get to the building pad and create the fire access road

IBI Group - 24-Aug-2022:

It does not appear the applicant has fully addressed this comment.

Revise the tree protection note on C.3 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.

SHEET EC.1 - Erosion control is different than protecting areas that are not to be disturbed. Protected areas should be fenced to ensure the soil remains uncompacted and plantings are protected during the entirety of construction. Alternatively, provide proposed remediation methods.

We have added fencing around areas to be protected. Tree protection notes have been updated.

IBI Group - 24-Oct-2022:

Noted: Tree protection detail cannot be located on submitted plans.

- The grading of the top of the slope to the right of the entry drive from Barnum Road is incomplete with the 286, 287 and 288 contours unresolved. The resolution of those contours results in the loss of another existing 18" oak.

This grading has been revised

IBI Group - 24-Aug-2022:

It does not appear the applicant has fully addressed this comment.

The grading has been revised to keep more existing trees.

IBI Group - 24-Oct-2022:

Noted

- The remaining oaks between the fire lane and Barnum Road would be lost with any flattening of the proposed 1:1 slope. Provide the required slope stabilization required for a 1:1 slope (see item 12) or provide a retaining wall.

This area is all ledge and we are proposing a blasted rock face at all slopes over 2:1

It does not appear the applicant has fully addressed this comment. Provide indication of on the plans where bare rock is expected to occur in relation to where screening is required. Applicant should account for over-excavation of 3-4 feet for soil depth for trees. Plantings cannot be proposed for bare rock face. Comment is typical for entire site where blasting is expected to be required.

IBI Group - 24-Oct-2022:

No response provided from Applicant

- The edges of the disturbed woodland surrounding the oaks to remain between Barnum Road and the fire lane shall be replanted with native woodland species.

See revised landscaping plan

IBI Group - 24-Aug-2022:

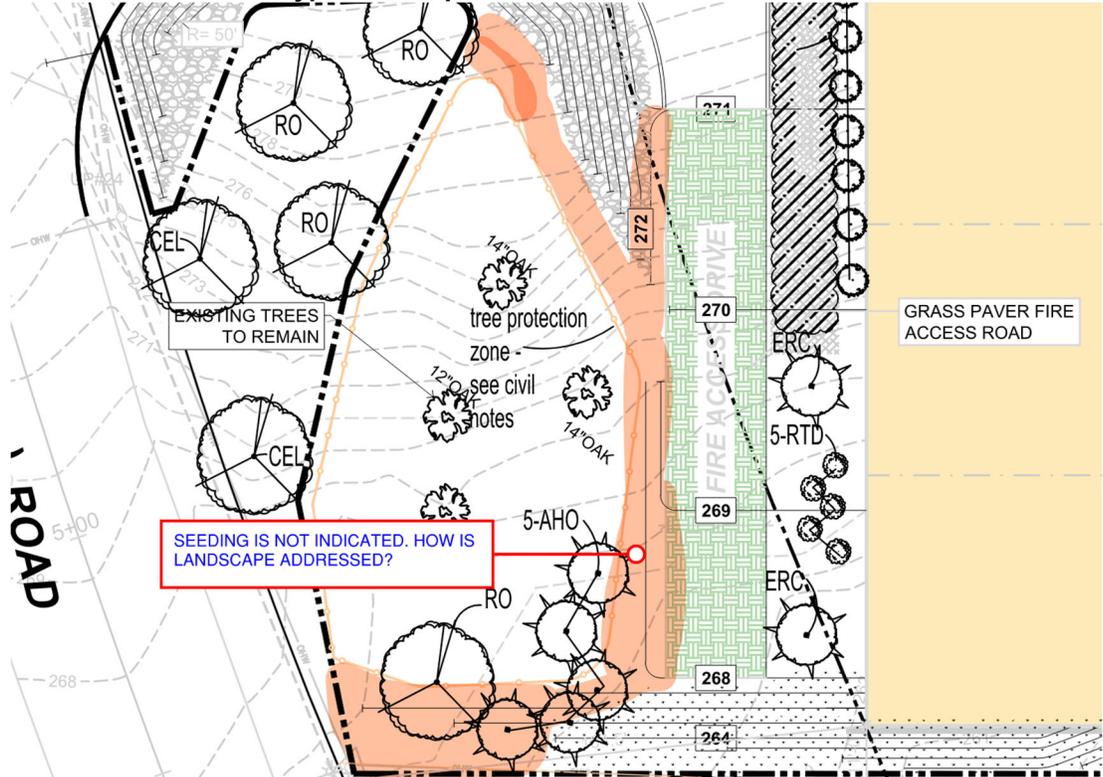
It does not appear the applicant has fully addressed this comment.

Plantings have been added between the fire access lane and the building.

IBI Group - 24-Oct-2022:

9. **This comment was addressing the planted areas between the cut slopes and the fire lane. Some are now exposed rock, but in the spaces between the protection fence zones and the hardscape, they require some type of landscape treatment. As per 3.04 (8) (c) 11 disturbed areas intended for natural re-growth to be, at a minimum, graded, loamed, and seeded.**

Ensure all disturbed areas within the limit of work are addressed. See screenshot below for typical example:



10. 3.04 (8) (e) describes the soil testing requirements.

The soil test results included in the Stormwater report identify the soils as sands. Additional information regarding the onsite soils' suitability as a growing medium is required, and any limitations suggested by the soils need to be reflected in the plant list.

We believe the plantings selected are appropriate for the onsite soils.

IBI Group - 24-Aug-2022:

It does not appear the applicant has fully addressed this comment. Confirm how the landscape is to be irrigated. Is automatic irrigation system being proposed? Explain how the proposed plantings be established and maintained without irrigation given the existing sandy soils.

We are not proposing irrigation. We have selected plantings that are drought tolerant.

IBI Group - 24-Oct-2022:

Applicant has not appropriately addressed this comment. IBI Group suggest DEC request a Landscape Maintenance Memo to ensure establishment of the proposed plantings can be achieved given the existing soil types and recent drought conditions.

11. 3.04 (8) (f) 2 requires the planting of lawn as a minimum and encourages the limiting of manicured lawn areas.

- Indicate the planting of the ground plane for all unpaved areas, including the strip between the parking edge and the retaining wall where the guardrail is sited.
- Consider the replacement of turf grass with low-mow fescue for ease of maintenance and the incorporation of more sustainable landscape practices in the narrow/treed turf areas proposed for the site.

See revised landscaping plan.

IBI Group - 24-Aug-2022:

It does not appear the applicant has fully addressed this comment. The comment to replace with the low mow fescue was meant for parking strips. Provide shrub and groundcover plantings at buildings, especially at entries.

We have added shrub and groundcover at the building- particularly at the entries

IBI Group - 24-Oct-2022:

Noted

12. 3.04 (8) (f) 3 requires slopes steeper than 3:1 to be planted with shrubs or trees for stabilization.

- Proposed slopes on the west, east and south sides of the site exceed 3:1 and are either underplanted to ensure stabilization or not planted at all. Massive slopes on the south side of the site are graded at 1:1.

The slopes shown at 1:1 are blasted edge rock faces and do not require stabilization.

IBI Group - 24-Aug-2022:

It does not appear the applicant has fully addressed this comment. Provide indication of on the plans where bare rock is expected to occur in relation to where screening is required. Applicant should account for over-excavation of 3-4 feet for soil depth for trees. Plantings cannot be proposed for bare rock face. Comment is typical for entire site where blasting is expected to be required.

We have identified where we expect bare rock faces

IBI Group - 24-Oct-2022:

Most of the west and east edges of the site are now graded at slopes of 2:1. An erosion control seed mix is called for in these areas. A 2:1 slope is too steep to maintain with the annual mowing required for establishment of these proposed seed mixes. Given the steepness of the slopes, IBI Group recommends DEC request a Landscape Maintenance Memo to ensure establishment of the proposed plantings can be achieved for slope stabilization that does not require mowing.

13. 3.04 (8) (f) 4 stipulates the treatment of 1:1 slopes for stabilization.

- Identify the slope stabilization for the extensive 1:1 slopes on the south end of the site.
- The 1:1 slopes at the south edge of the site flanking the entry drive must be stabilized

with bioengineering methods of erosion control and 100% plant cover.

The slopes shown at 1:1 are blasted edge rock faces and do not require stabilization.

IBI Group - 24-Aug-2022:

It does not appear the applicant has fully addressed this comment. Provide indication of on the plans where bare rock is expected to occur in relation to where screening is required. Applicant should account for over-excavation of 3-4 feet for soil depth for trees. Plantings cannot be proposed for bare rock face. Comment is typical for entire site where blasting is expected to be required.

We have provided screening where we believe it is feasible- see waiver request.

IBI Group - 24-Oct-2022:

IBI Group defers to DEC for review and acceptance of the conditions of all waiver requests.

14. 3.04 (8) (f) 6 stipulates the treatment of proposed landscaped areas to ensure that the soils are not compacted.

Indicate the location of construction laydown areas. Confirm that the areas not covered by building or pavement will not be used for laydown or provide direction for the decompaction of these areas.

Construction Laydown areas have been identified on EC.1

IBI Group - 24-Aug-2022:

It does not appear the applicant has fully addressed this comment.

SHEET EC.1 - Laydown areas are suggested and do not prevent a contractor from utilizing a protected zone, or inadvertently driving into a zone that is only indicated with silt/snow fencing.

Protected areas should be fenced to ensure the soil remains uncompacted and existing plantings are protected during the entirety of construction. Alternatively, provide proposed remediation methods.

We have provided 6' chain link fencing at protected areas.

IBI Group - 24-Oct-2022:

Noted

15. 3.04 (8) (g) describes screening requirements for buildings, vehicular zones, and unsightly areas viewed from public ways and the Open Space and Recreation Zoning District.

- The three existing oaks (see item 8 for the regrading required to save them) provide only partial screening of the southeast corner of the building. Provide the required 6' high minimum year-round screening that is visually impermeable within 3 years' time to flank the fire lane's intersection with Barnum Road.

See revised landscaping plan.

- The parking lot is visible from the entry drive on Barnum Road. Provide the required 6' high minimum year-round screening that is visually impermeable within 3 years' time flanking the drive entry and on the large 3:1 slope flanking the drive.

See revised landscaping plan.

- The parking lot is unscreened from Saratoga Blvd. Provide the required 6' high minimum year-round screening that is visually impermeable within 3 years' time.

See revised landscaping plan.

IBI Group - 24-Aug-2022:

It does not appear the applicant has fully addressed these screening comments. Screen plantings appear inadequate, even excepting the requested waivers. Suggest the applicant update the provided elevations with the proposed planting and grading and to address questions regarding screen planting.

This is also important as the perception of the screen height is affected when the vantage point is above or below the relative elevation of the parking.

We have provided screening where we believe it is feasible- see waiver request.

IBI Group - 24-Oct-2022:

IBI Group defers to DEC for review and acceptance of the conditions of all waiver requests.

- The parking lot on the north side of the building is visible from the entry to the existing Avantar building and lacks the required 6' minimum depth year-round screening that is visually impermeable within 3 years' time. The proposed slope of the narrow planting strip is too steep for the planting of the proposed arborvitae. (See item 5)

Plantings have been added on the Avantar property on the low side of the retaining wall.

IBI Group - 24-Aug-2022:

Although the layout has been adjusted, the ground plane is not addressed, and this screen planting approach requires the abutter agreement to be formalized in some way to ensure any future property owners are also obligated to retain the plantings via a development easement, or other approach acceptable to DEC.

IBI Group - 24-Oct-2022:

Applicant had not provided a response. IBI Group defers to DEC for review and acceptance of the conditions of all waiver requests.

16. 3.04 (8) (h) 2 requires one tree per 25 lineal feet of parking perimeter plus one tree per 50 feet in areas where screening is required.
 - No trees are currently called for the edges of parking for the majority of the site due to the

parking edges being too close to the property line. Pull the parking further from the property line and provide the required number of trees, arranged informally rather than aligned with the edge of the parking lots.

We are requesting a waiver from this requirement along the eastern property line.

- The 150' length of the north edge of the parking lot requires nine shade trees. Only five are provided.

We added shade trees here

IBI Group - 24-Aug-2022:

It does not appear the applicant has fully addressed this comment. Provide specific reference written or graphical representation of how the comment has been addressed to avoid delays of additional submittals and reviews.

IBI Group - 24-Oct-2022:

Applicant had not provided a response.

17. 3.04 (8) (h) 3 and 4 describe the planting requirements for parking islands.

- Four areas of the parking areas lack the required internal islands containing one deciduous shade tree—the front of the building, the west face of the building, and two sections along the west property line. Provide the additional four islands.
- Some of the internal islands lack trees. Add a deciduous shade tree to each island. (See item 2 under 3.04)
- The trees within the internal islands that include walkways are located too close to the curb. Shift the walkway to provide the required distance to the curb and an adequate distance to the walkway.
- The *Amelanchier* proposed for five of the internal islands are not deciduous shade trees. Provide a larger canopied tree to provide the desired shade for the parking area. (See item 6)
- The large linear divider island and the terminal island at its northern end lack the required shrub planting. Provide the shrubs as required.

See revised landscaping plan.

IBI Group - 24-Aug-2022:

Noted

18. 3.04 (8) (k) requires the planting of street trees.

No street trees have been proposed for Barnum Road. Provide the required street trees.

Street Trees have been provided along Barnum Road in the revised landscaping plan set

IBI Group - 24-Aug-2022:

The proposed red oak could get quite large; ensure proposed locations will not conflict with existing low utility lines and roadway lighting that may necessitate removal of the street trees as they mature.

We have provided screening where we believe it is feasible- see waiver request.

IBI Group - 24-Oct-2022:

Street trees are not provided as noted, and the limit of work does not extend to Barnum Road. IBI Group defers to DEC for review and acceptance of the conditions of all waiver requests.

19. 3.04 (8) (I) describes the landscape treatment for building facades

The south face of the building, visible from Barnum Road lacks the required continuous landscape treatment. Add the required landscape elements in an informal manner.

See revised landscaping plan.

IBI Group - 24-Aug-2022:

It would be very helpful to see the grading and mature planting and proposed grading in front of the elevations to demonstrate the screening is being provided as the planting plan view does not seem to support this statement.

IBI Group - 24-Oct-2022:

Applicant had not provided a response.

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

Kind regards,



James Kros, RLA