

May 4, 2022

Devens Enterprise Commission  
c/o Mr. Neil Angus, AICP CEP, LEED AP  
Environmental Planner  
33 Andrews Parkway  
Devens, MA 01434

RE: Nitsch Project #9419  
35 Saratoga  
Site Plan and Stormwater Review  
Devens, MA

Dear Mr. Angus:

Nitsch Engineering received and reviewed the Site Plans (the Plans) entitled, "Proposed Building, 35 Saratoga Boulevard, Devens, Massachusetts," dated April 20, 2022, prepared by Eugene T. Sullivan, Inc. In addition, Nitsch Engineering has received and reviewed the following documents:

1. Level 2 Unified Permit Application, prepared by Eugene T. Sullivan, inc., dated April 7, 2022;
2. Supplemental Filing Documentation, prepared by Eugene T. Sullivan, Inc., dated April 22, 2022;
3. Sight Distance Assessment, 35 Saratoga Boulevard, Devens, MA, prepared by Bayside Engineering, dated March 31, 2022;
4. Stormwater Drainage Management Report, prepared by Eugene T. Sullivan, Inc., dated April 20, 2022;  
and
5. Level 2 – Unified Permit, Checklist for Determination of Completeness, dated April 12, 2022.

Nitsch Engineering is providing comments with respect to Site Plan and Stormwater Management in this letter. Please note that and landscape review are being provided in separate letters.

## **PROJECT UNDERSTANDING**

The property owner is seeking approval to clear the 35 Saratoga Boulevard site and construct a +/-154,000-square-foot new industrial building. The project will include associated grading, landscaping, retaining walls, parking, stormwater, and utility improvements. The proposed tenant is Avantor (Bio-Tech) who currently owns and occupies the adjacent facility at 29 Saratoga Boulevard. This new development would be accessed via Barnum Road and Saratoga Boulevard. The principle entry to the site is proposed off of Saratoga Boulevard via a shared driveway with Ryerson (45 Saratoga Boulevard). The Barnum Road entry is being proposed for truck traffic and restricted to right turns only, as sight distance is a concern.

## **DEC REGULATORY CONFORMANCE**

Based on Nitsch Engineering's review of the submitted documents and the above-referenced regulations, we offer the following comments for consideration:

Due to the nature of the comments that may cause significant site plan and/or stormwater management design changes, not all comments may be reflected at this point. Nitsch Engineering will re-evaluate upon site plan and stormwater management updates.

## DEC SITE PLAN REVIEW DESIGN STANDARDS

1. **974 CMR 3.04(1)(a)** requires the minimum setbacks of structures from lot lines shall be: Front Yard: 25 feet; Side Yard: 10 feet; and Rear Yard: 25 feet. A retaining wall is considered a structure and must follow the setback requirements. The Applicant should review and address this requirement.

**To be reviewed and Discussed with the Commission**

2. The parking space counts within the Parking Calculations Table on Sheet C.2 and Supplemental Filing Information do not appear to be consistent with the parking shown on the plan. The Applicant should review these discrepancies and confirm the proposed number of spaces is in accordance with **974 CMR 3.04(3)(a)1**.

**This table has been revised**

3. **974 CMR 3.04(3)(a)(1)a** requires the following: In cases where buildings in the Rail, Industrial, and Trade Related District are set back 150 feet or more, parking is permitted in the front of the building. In such instances, a landscaped strip between the front lot line and the parking lot, measuring at least 60 feet deep, shall be provided. We note that this site has frontage along both Barnum Road and Saratoga Boulevard. The Applicant should review and address this requirement as the parking on Saratoga Road is within 60 feet of the property line.

**The parking will be re-configured to provide a 60' landscaping strip along Saratoga Boulevard**

4. **974 CMR 3.04(3)(a)(1)c** requires 2% of the parking spaces be Americans with Disabilities Act (ADA) compliant. Based on 339 spaces, 2% would be 6.8 spaces, therefore the Applicant should round up to seven (7) spaces. Additionally, all proposed accessible parking spaces are provided in the northern parking lot. The Applicant should confirm that no additional accessible spaces are needed in the eastern parking lot.

**We will provide a total of 7 ADA spaces. We will relocate 2 spaces to the eastern parking lot.**

5. **974 CMR 3.04(3)(a)(1)e** requires that parking lots shall extend no more than 180 feet in either length or width without a landscaped island and a pedestrian connection through the parking area and pervious landscape island(s) that is a minimum of 5 feet wide and bordered by 3-inch caliper deciduous shade trees planted a minimum of 40 feet on center. The landscape areas shall be an 18-foot minimum width along intermediate islands, and a 10-foot minimum width for terminal islands and divider islands (see 974 CMR 3.06(2) Figure B). Parking lots measuring less than 180 feet in either length or width shall be divided into bays not greater than 72 feet in length by terminal or intermediate island (see 974 CMR 3.06(2) Figure B). Terminal islands shall be 10 feet in minimum width and intermediate islands shall be 18 feet minimum in width. Portions of the parking lot do not meet these dimensional requirements, and the Applicant should review and address this requirement.

**The parking area layouts have been modified to meet this requirement.**

6. **974 CMR 3.04(3)(a)(2)b** requires the portion of the parking lots, loading docks, and driveway subject to truck traffic, truck and container storage, and other railroad related vehicles, shall be constructed of bituminous concrete pavement. The construction specifications shall be as indicated in section **974 CMR 3.04(3)(a)(2)b i-vi**. It appears that the Heavy Duty Pavement Detail provided meets the requirements noted above, however the "New Paved Areas" note provided on the Site Plan Layout does not list the same dimension as the detail. The Applicant should review for consistency.

Additionally, the loading dock area is labeled as a concrete apron but this standard applies to areas including the loading dock. As only the Heavy Duty Pavement Detail is provided, it is our understanding that the entire parking lot, with the exception of the porous pavement, will be exposed to truck traffic and Heavy Duty Pavement should be used.

**The note on C.2 has been revised. All parking with the exception of porous pavement will be per the heavy duty pavement detail**

7. **974 CMR 3.04(3)(a)(2)d** requires parking spaces and striping shall be painted according to the MHDSSHB. Lines shall be located along the sides and unless curbing is present, at the head of parking stalls. Lines shall be a minimum of 4 inches wide and shall be one (1) consistent color, either reflective yellow or reflective white paint. The paint does not appear to be specified on the Site Plan Layout or Site Details Plan. The Applicant should clarify this requirement on the Plans for both ADA and typical spaces.

**The note has been revised on C.2**

8. **974 CMR 3.04(3)(a)(4)d** requires that Commercial, Industrial, and Multi-Family Residential driveway widths shall be no greater than 24 feet for a two-way (2-way) driveway and 14 feet for a one-way (1-way) driveway. The proposed driveways range from 24 to 35 feet wide.

**The driveway from Saratoga Boulevard is existing and we are not proposing any changes**

**The trucking driveway is larger to accommodate the turning radius of the tractor trailers.**

9. **974 CMR 3.04(3)(a)(4)g** requires standard "STOP" at the intersection of driveways with streets and roads. The Applicant should evaluate the intersections of the internal driveways and curb cut at Saratoga Boulevard to provide adequate signage for traffic safety. We note that there is no separation between the stop bar and the Barnum Road travel lane; this should be reevaluated for safety and sight distance.

**A stop sign and stop line have been added at the Saratoga entrance and also out of the office parking area near the main drive entrance**

10. **974 CMR 3.04(3)(a)(5)** requires that the Applicant shall obtain a letter from the Fire Chief stating there is adequate access for fire equipment. This should be provided to the DEC.

**The Fire Chief has reviewed the plan previously, we will request that the Chief provide the memo to the DEC.**

11. **974 CMR 3.04(3)(a)(10)** requires that all proposed developments shall demonstrate that they have made reasonable efforts to consider and implement transportation demand management strategies early in the site planning and layout process. These include providing 5% of total parking spaces for each of the following: ridesharing, hybrid or zero/low-emitting vehicles, and hybrid/electrical vehicle plug-in/recharge stations. We note that the Applicant has provided five (5) parking spaces for electric vehicles and four (4) spaces for carpool, both of which are approximately 1% of the total parking count. The Applicant should review and address this requirement and add these calculations to the Parking Calculations Table on the Site Plan Layout.

12. **974 CMR 3.04(6)(a)(2)a** requires vertical granite curb or cement concrete curb is required at all driveway entrance roundings to the point of rounding tangency. Proposed curbing should tie into

existing curbing and, in areas where there is no curbing, have transition curbing to tie into ground level. The Applicant should address this requirement at both the Saratoga Boulevard and Barnum Road entrances.

**The curbing has been revised at the drive entrances.**

13. The Applicant should provide turning movements to clarify the need for the pavement expanses throughout the site and specifically within the loading dock. Where feasible, pavement area should be minimized. This may provide additional area to enable some retaining walls to be pulled back out of the setbacks.
14. There are six (6) unprotected parking spaces located immediately adjacent to the loading dock. The design of these spaces should be reviewed as they appear at-risk for collision with trucks accessing the loading docks.

**The three unprotected spaces have been removed**

15. The Applicant should complete all information in the Zoning Requirements Table on the Site Plan Layout.

**The Zoning table has been updated**

16. Please add the north arrow to the Site Plan Layout.

**The North Arrow has been added.**

17. The Applicant should review the top and bottom of wall elevations listed on the Site Plan Layout and confirm that all elevations/contours are accounted for. There appears to be instances where a contour is skipped or not tied into the existing condition.

## **SIGHT DISTANCE REPORT**

18. Please provide the date(s) of the traffic counts used. Since they are from a 2020 report, if the counts themselves were taken that year, clarify whether the volume measurements were taken prior to or during the pandemic. If during the pandemic, please explain if any adjustments were made to establish base traffic conditions.
19. Did the traffic counts include speed data? If so, please provide 50<sup>th</sup> and 85<sup>th</sup> percentile speeds on both study roadways.
20. The report states the sight distance calculations are attached, but they appear to be missing. Please provide any relevant sight distance calculations.
21. For the required minimum sight distances in Table 1, please use the Design values from the AASHTO Green Book (2018) Tables 3-1 and 9-7 (rounded-up values, as are standard), or as adjusted for grade. Please ensure the value for SSD for Saratoga Boulevard approaching from the south at 30 MPH is corrected, as well.

22. If either of these roadways has a grade affecting the sight distance (3% or greater), please describe it in the Sight Distance Assessment section and ensure that any calculations provided reflect those grades.
23. In Figures 1 and 2, what is the visual obstruction between driver and object used to determine the sight line?
24. In the last paragraph on page 2, it is stated that the Barnum Road and site driveway intersection will be used for trucks only, but it looks like Barnum Road itself serves other properties and connections so that will have a mix of traffic, and only the site driveway is limited to trucks. Please clarify, and if the roadway will also have passenger cars, in Figure 1, use a driver eye height of 3.5 feet for a passenger car instead of the truck driver eye height.
25. In Figure 2, what distance back from the edge line is used? If using a distance other than the standard 14.5 feet, please explain.
26. Describe whether these measurements all done in CAD, or if there were any field measurements. Please provide figures showing all SSD and ISD measurements done in CAD. For any field measurements, provide the date(s) taken. Also, describe any considerations for change in foliage/vegetation levels for different times of year, especially if taken when there was little or no foliage/vegetation.
27. It is unclear from Table 1 if the ISD for Barnum Road and Site Driveway looking east meets the criteria for 40 MPH for vehicles turning left (minimum 441 feet, measured 400+ feet). Please provide a more specific measurement, and if it is less than the minimum, please explain.
28. At the bottom of page 3, it is stated that "ISD should be at least equal to the SSD." Please clarify if that is the required minimum SSD or the measured SSD.
29. On page 6, it says the measured ISD at the proposed site driveway is 550+ feet. Please clarify whether this referring to one (1) of the driveways or both. Either way, the measured ISDs in Table 1 do not match. Please correct the table and/or the narrative.

## **DEC STORMWATER DESIGN STANDARDS**

30. **974 CMR 3.04(4)(a)(3)** requires low Impact Development (LID) Stormwater Management design shall be incorporated into the site plan to allow for the full utilization of the property while maintaining the pre-development characteristics of the site as though it were a "green field" (volume, frequency, peak runoff rate) to the maximum extent feasible. Maximizing the use of pervious areas minimizes stormwater runoff from a site, improves stormwater quality, and increases groundwater recharge. While we understand that 6.2 acres of site area is accounted for in the Southeast Quadrant Detention Pond, the green field requirements still must be met for the remainder of the site. The HydroCAD model and Section 3.0 of the Stormwater Report indicate that only 75% of the 6.2 acres can be accounted for as impervious, allowing 4.65 acres of impervious area to overflow to the existing basin. The HydroCAD model indicates that 5.62 acres of impervious area (proposed roof and parking, not including porous pavement) overflow to the existing basin. Additionally, when comparing the existing to proposed for the remainder of the site, the existing condition should be modeled as a green field. The Applicant should review and address this requirement.

**The HydroCAD model has been revised to reflect the existing conditions as a “green field”. Calculations have been provided showing that even though the proposed impervious area is greater than what was originally accounted for, both peak rates and volumes have been reduced for all design storms through the use of stormwater best management practices.**

31. **974 CMR 3.04(4)(b)** requires Stormwater Management options shall include green infrastructure and LID techniques, including but not limited to vegetated swales, rain gardens, bio-filtration landscape islands, rainwater harvesting, and pervious pavement, where feasible, to achieve infiltration/capture/reuse of stormwater runoff on-site.
- a. While we appreciate the use of the porous pavement, there is some unclarity on how this system will function. Much of the porous pavement system is at 3% slope or greater. The HydroCAD model indicates only one (1) elevation for the entire system, but there is an 11-foot grade change between one (1) end of the porous pavement and the other. No overflow is indicated in the HydroCAD model or plans, and this area is not accounted for in the overflow volume to the Southeast Quadrant Detention System. Due to the significant grade change, water may seep out of the pavement at the lower elevations; the bottom of the system elevation at the southwest side of the parking lot will be above the pavement elevation at the northeast side of the parking lot. While we encourage LID, this system should be evaluated to consider the significant grade change as well as any potential overflows. The Applicant may consider making the system tiered or adding subsurface check dams.

**At a 3% slope the pervious pavement should function, as designed. Tiered systems and/or subsurface check dams are not required for slopes less than 5%.**

- b. Additionally, there is a parking area to the northwest of the proposed building that appears to be excluded from truck traffic and has less significant grade change. The Applicant may consider this parking lot as an additional opportunity for porous pavement.

**Due to the existing of bedrock in the area of the northwest parking area, this area of the project is not a good candidate for porous pavement. Porous pavement was proposed in all areas where stormwater test pits have been conducted indicating deep sandy natural soils.**

32. **974 CMR 3.04(4)(b)(4)** requires that catch basins or other drainage features in loading/unloading and/or fueling areas shall be equipped with post-indicator valves (which are to remain in the closed position) on the outlets for containment in the event of any spills. The Applicant should review and address this requirement.

**The plans have been revised to include 12” gate valves on all drain lines connected to catch basins located within the loading area.**

33. **974 CMR 4.08(2)(c)(vi)** requires all projects shall incorporate LID techniques for stormwater management to the maximum extent feasible. For projects proposing traditional closed drainage systems, the Applicant shall demonstrate to the satisfaction of the DEC why LID stormwater management design methods are not feasible. While we appreciate the use of the porous pavement, the site does not make an effort to replicate natural conditions of infiltration, evapotranspiration, and runoff. The majority of the site is strung together by a series of catch basins and manholes discharging water at the far end of the site, not promoting decentralized stormwater management systems or modeling natural hydrologic features and infiltration practices that facilitate local groundwater recharge.

The Applicant may consider creating additional opportunities for LID and decentralized stormwater management throughout the site by grading towards the parking lot islands and considering rain gardens or bioretention basins. The Applicant should review and address this requirement.

**LID stormwater management design methods have been utilized to the maximum extent practicable for the project.**

34. **974 CMR 4.08(3)(a)** requires that biofiltration basins shall be the preferred method to reduce curbing, piping, and structures and provide additional overland treatment and recharge. They shall be designed in accordance with the Handbook. The Applicant should review and address this requirement.

**Based on the underlying existing soils located on site, as well as limitations due to the slope of the site, biofiltration basins were not practical for this project.**

35. **974 CMR 4.08(3)(b)** requires the post-development peak rate of stormwater discharge off-site shall not be greater than the pre-development peak rate of stormwater discharge for the two – (2-), 10-, 25-, 50-, and 100-year storm events from any point of discharge on the site. It appears the stormwater report does not include the analysis for the 50-year storm. The Applicant should review and address this requirement.

**The HydroCAD model has been revised to include the 50-year storm.**

36. **974 CMR 4.08(3)(g)** recommends post-construction erosion control methods include geotextile and/or biodegradable erosion control fabrics staked or anchored to the slope, with loose weave to allow vegetative cover to be established. Vegetative cover shall consist of native woody plant species installed as live brush or nursery stock, or native grasses. The Applicant should update Sheet EC.1 to show the locations of slope stabilization. Additionally, Sheet EC.1 should be updated to include the proposed condition as there will be significant site regrading that will require stabilization.

**Slope stabilization is not anticipated to be necessary as slopes are 2:1 or greater except where blasted rock faces will remain post construction**

37. **974 CMR 4.08(3)(i)** requires that stormwater management systems be designed to meet an average annual pollutant removal equivalent to 90% of the average annual load of Total Suspended Solids (TSS) related to the total post-construction impervious area on the site and 60% of the average annual load of Total Phosphorus (TP) related to the total post-construction area on the site. The treatment train provided does not meet the 90% TSS removal calculation and does also not indicate what water quality volume is being treated. The Applicant should review and address this requirement.

**The proposed roof and proposed porous pavement are both being recharged into the ground in order to help promote the removal of phosphorus. The remainder of the impervious area is being directed towards the Southeast Quadrant Detention Pond, which also provides phosphorus removal in compliance with the MS4 Permit.**

38. **974 CMR 4.08(3)(j)** requires that all best management practices (BMPs) must be optimized for the removal of phosphorus to support compliance with the MS4 Permit. The justification and design of such



BMPs must also include a methodology for assessing BMP performance. Pollutant removal shall be consistent with EPA Region 1's evaluation tool. The Applicant should review and address this requirement.

**The proposed roof and proposed porous pavement are both being recharged into the ground in order to help promote the removal of phosphorus. The remainder of the impervious area is being directed towards the Southeast Quadrant Detention Pond, which also provides phosphorus removal in compliance with the MS4 Permit.**

## STORMWATER DESIGN AND CALCULATIONS

39. The Cultec Detail provided indicates that the maximum cover allowable above the chamber is 8.3 feet. It appears that there will be approximately 9 feet or greater of cover above the southwest portion of the Cultec Infiltration System. The Applicant should review this condition and ensure that the maximum and minimum cover depths are met.

**The design of the underground infiltration system has been revised to provide less than 8.3 feet of cover over the chambers.**

40. The invert out of the Infiltration System is labeled as elevation 258.00 feet in the plans but modeled as 257.25 feet in the HydroCAD, the Applicant should review and address for consistency.

**The plans and the HydroCAD model have been revised for consistency.**

41. The details provide a Permeable Paver Detail but the location of permeable pavers is not located on the Site Plan Layout. The Applicant should review and address for consistency.

**The plans have been revised to remove the Permeable Paver Detail.**

42. The Applicant should be mindful of trees on top of the infiltration system. The Applicant should review species and root penetration depths.

**The proposed landscaping has been revised to remove trees from the top of the infiltration system.**

43. There appears to be multiple catch basins with 3 feet from rim to invert. The Applicant should confirm constructability of the shallow connection and provide a shallow catch basin detail if required.

**The proposed catch basins and pipe depths have been reviewed. In our professional opinion, shallow catch basins will not be required on site.**

## CONFORMANCE WITH THE MASSDEP STORMWATER STANDARDS

In accordance with **974 CMR 4.08(2)(a)**, Nitsch Engineering reviewed the stormwater design and calculations for general conformance with the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Standards. Based on this review, Nitsch Engineering offers the following comments:



44. **Standard 3** requires the annual recharge from the post-development site shall approximate the annual recharge from pre-development conditions based on soil type. This Standard is met when the stormwater management system is designed to infiltrate the required recharge volume as determined in accordance with the Massachusetts Stormwater Handbook. A Recharge Volume Calculation is provided in Section 7.0 of the Stormwater Report. However, the Applicant appears to using a 'B' soil to calculate the required infiltration volume but is using a 'A' soil infiltration rate in the HydroCAD model. The Applicant should use a consistent soil group for both the required recharge volume and infiltration rate.

**The HydroCAD model and the stormwater calculations have been revised to use 'A' soils throughout the entire site.**

45. **Standard 4** required stormwater management systems shall be designed to remove 80% of the average annual post-construction load of TSS. A Treatment Train was provided however, the Applicant should provide documentation on the water quality volume being treated. Refer to Comment 38 as Devens 4.08 General: Stormwater Management Regulations require 90% TSS removal.

**The Contech CDS Unit has been sized based on the flow capacity of a 1" equivalent water quality flow rate.**

46. **Standard 8** requires a plan to control construction-related impacts including erosion, sedimentation, and other pollutant sources during construction and land disturbance activities (construction period erosion, sedimentation, and pollution prevention plan) shall be developed and implemented. An Erosion Controls Plan has been included with this submission (Sheet EC.1) however this plan does not indicate any erosion controls in the proposes condition such as inlet protection or slope stabilization.

**Inlet Protection has been added to EC.1. Slope stabilization is not anticipated to be necessary as slopes are 2:1 or greater except where blasted rock faces will remain post-construction.**

If the Commission has any questions, please call.

Very truly yours,

**Nitsch Engineering, Inc.**

Approved By:

Paige Simmons, PE, LEED Green Associate  
Project Engineer

Jennifer Johnson, PE, CFM, CPSWQ, LEED AP  
Deputy Director of Planning

PES/JLJ/ajc