

Neil Angus, FAICP CEP, LEED AP
Director / Land Use Administrator
Devens Enterprise Commission

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Date: 17 November 2025
Arcadis Ref: 30255527 (122047-prev.) – Task 0019
Subject: Devens Peer Review
CFS-3 – 125, 111 and 105 Hospital Road
Parcel ID 018.0-0007-0200.0

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Dear Neil,

Arcadis has reviewed the preliminary submittal for 117 & 125 Hospital Road – Level 2 Unified Permit Application Documents dated October 23, 2025, including the following supporting documents:

- 14867.08 CFS-3 Level 2 Permit Site Plans – October 2025.pdf
- DOC – CFS 3 125 117 111 and 105 Hospital 10-30-25.pdf
- CFS Site Section_Visual Impact Assessment_DRAFTv2.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 under separate submission from Nitsch Engineering.

Thank you for your review of the documents. The organization and clarity of the comment letter was very much appreciated! Sincerely,

Anthony Cortese, LLA, ASLA, LEED BD+C
*Senior Landscape Architect, Associate
Urban Design, Planning, and Landscape Architecture*

Comments Related to 974 CMR 3.02: SITE PLAN

1) 3.02 (3) (b) 6 (a). – Landscape Treatment

All existing landscape features, especially existing trees and woodland to remain, shall be shown on ALL site plan sheets....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.”

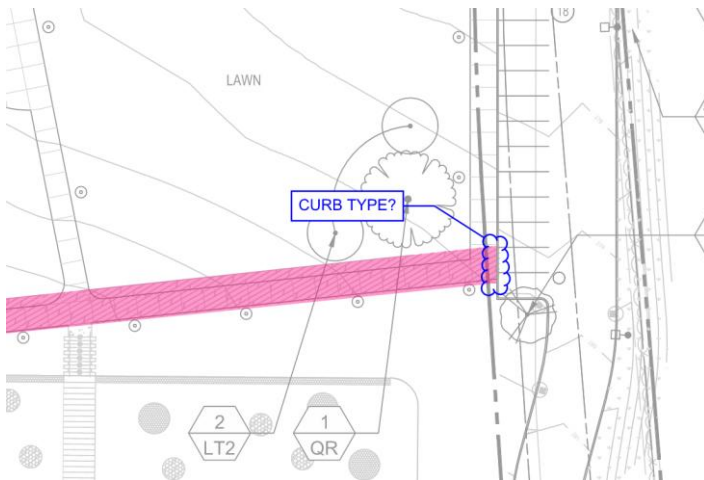
- a) Tree protection detail shows tree protection fence at tree dripline. Tree protection fencing is required to be 12" minimum beyond dripline of trees.

The tree protection detail has been revised to show the 12" minimum beyond the dripline of trees.

Comments Related to 974 CMR 3.04: DESIGN STANDARDS

2) 974 CMR 3.04(3)(a)(5) Fire Equipment Access

- a) Annotate/confirm intended use of southernmost walkway on quad, which calls out heavy duty concrete pavement and reinforced turf. If intended use is for fire/emergency vehicle access, the following must be applied: Access to buildings shall be kept clear of hazardous substances and obstacles that may, in the opinion of the fire officials, impede the proper placement of fire apparatus and personnel in case of emergency. The Applicant shall obtain a letter from the Devens Fire Chief stating there is adequate access for fire equipment. Access for fire equipment shall be provided and maintained on at least two sides of the building. Fire lanes shall be designated with pavement marking and signage. The Applicant should provide a letter from the Devens Fire Chief confirming compliance with this requirement.

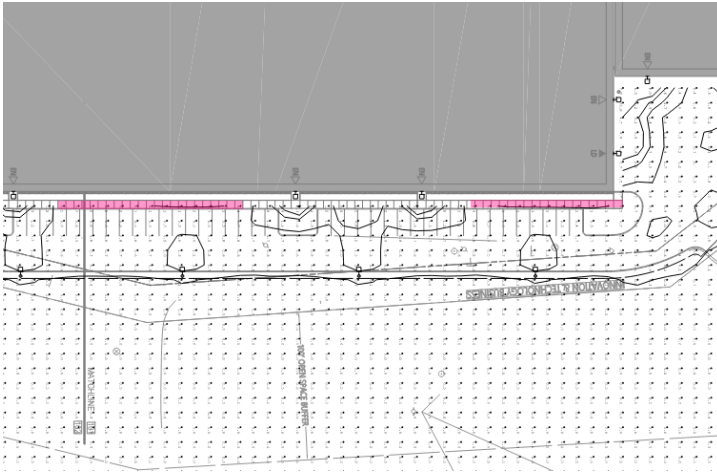


The drive is intended for vehicular access to set up tents or events on the central lawn. This is not intended for fire truck access.

3) 3.04 (6) (a) 3 (a). – Lighting.

Access Road/Parking lighting shall be 0.5-foot candles minimum (maintained), with 30' maximum height posts.

- a) Indicate which lights (if any) shall remain on overnight.
 - i) Since the facility is a 24/7 facility, the lights will be on overnight and shall use a photocell to turn off when sufficient daylight allows. A sheet note will be added to the plans to indicate this.*
- b) Proposed and existing trees to remain shall be included on site lighting plans and photometrics to ensure no conflicts.
 - i) Concur, proposed and existing vegetation will be added to the plans.*
- c) On Sheets ES111 and ES112, foot candles far under 0.5 are shown on walkways along East side of the proposed building. Provide lighting to ensure safely lit walkways along this façade. Areas highlighted in pink (plan rotated, North is page right):

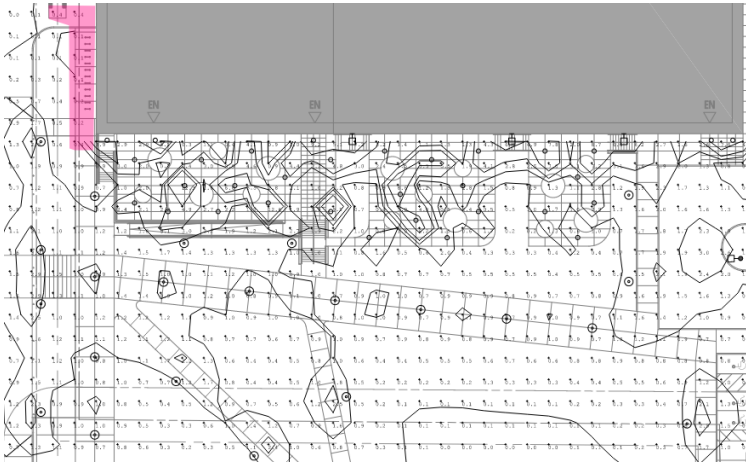


To illuminate the areas highlighted in pink, additional wall packs will be required. We recommend that these additional wall packs be on occupancy sensors to minimize façade illumination. These will be indicated on the plans, complementary to item (a) above.

4) 3.04 (6) (a) 3 (b). – Lighting.

Walkway lighting shall be 0.5 foot candles minimum (maintained, with 15'-18' high posts.

- a) Indicate which lights (if any) shall remain on overnight.
 - i) Since the facility is a 24/7 facility, the lights will be on overnight, and shall use a photocell to turn off when sufficient daylight allows. A sheet note will be added to the plans to indicate this.*
- b) Proposed and existing trees to remain shall be included on site lighting plans and photometrics to ensure no conflicts.
 - i) Concur, proposed and existing vegetation will be added to the plans.*
- c) On Sheets ES111 and ES112, foot candles far under 0.5 are shown on walkways on the Southwest corner. This bike parking area should be well lit to ensure cyclists have ample light to lock/unlock their bikes easily and safely. Area highlighted in pink below:



To illuminate the areas highlighted in pink, additional wall packs will be required. We recommend that these additional wall packs be on occupancy sensors to minimize façade illumination. These will be indicated on the plans, complementary to item (a) above.

2) 3.04 (8) (c) 8. – Road de-icing salt tolerant plants

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.).

a) The following plant material is identified as having low tolerance to road de-icing salts and has been placed within 20' of proposed roads/paved areas and should be substituted with tolerant plants and/or moved out of 20' buffer:

- i) *Ilex opaca*
- ii) *Rhododendron carolinianum*
- iii) *Sporobolus heterolepsis*

The identified plant material will either be substituted for salt tolerant material or shifted beyond the 20' offset from roadways.

3) 3.04 (8) (d) 2-5. – Preservation of existing vegetation

Areas of previously cleared woodlands on site that are not utilized shall be re-planted with native woodland species. Edges of previously cleared woodlands on site shall be planted with a mix of blueberry, rhododendron, winterberry, bayberry, shrub dogwoods, cranberry bush, spicebush, native viburnums and other hardy shrubs to transition between natural woodland and more formally landscaped portions of a site.

- i) The proposed planting palette would benefit from the addition and/or substitution with the above plantings.

A selection of the species above will incorporate into the planting design to complement the woodland edge and plant areas of previously cleared woodland as suggested.

4) 3.04 (8) (e) 3. – Soil Testing

In order to select plant material that is appropriate for the climate, soil type, light, exposure, and gradient of the site, the Applicant shall have the existing soil tested for both mechanical sieve and chemical analyses by an independent testing laboratory.

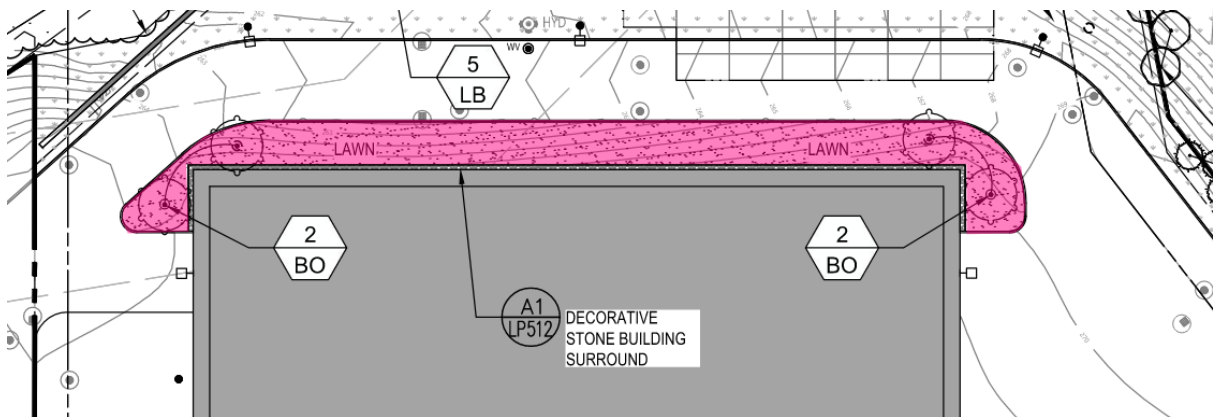
- a) Confirm that soil testing has been conducted and plant material has been selected based on the soil test results, specifically the New England Wetland Plants Wildflower Mix.

Topsoil test reports for the CFS site for the CFS-2 project have been provided to the CFS-3 design team. Soil tests were performed by UMass Amherst and dated May 2, 2025. The reports indicate test results along with recommendations for amendments. I reviewed the test results with New England Wetland Plants, and they indicated that the pH and organic matter content are acceptable. Further, NEWP indicated that too many additional inputs or amendments could potentially harm or burn the seed.

5) 3.04 (8) (f) 3. – Slope Stabilization

Any unpaved areas steeper than 1:3 shall be planted with shrubs or groundcover having fibrous root systems.

- a) Planted area at North side of building is graded at $\pm 1:3$, which is recommended to be planted with slope stabilizing material. Precise 1:3 slopes are difficult to achieve uniformly with site grading, and may become greater than 1:3 over time, leading to maintenance issues. Additionally, establishing a seeded lawn on a slope of $\pm 1:3$ is challenging; consider proposing a no mow seed mix intended for steep slopes, and/or additional plantings of native shrubs and groundcovers with fibrous root systems.



Per comment #6, and per item (a) above, the highlighted area will be planted with deciduous and evergreen trees to help screen the garage. The understory layer will be planted with groundcover and native shrubs to stabilize the slope.

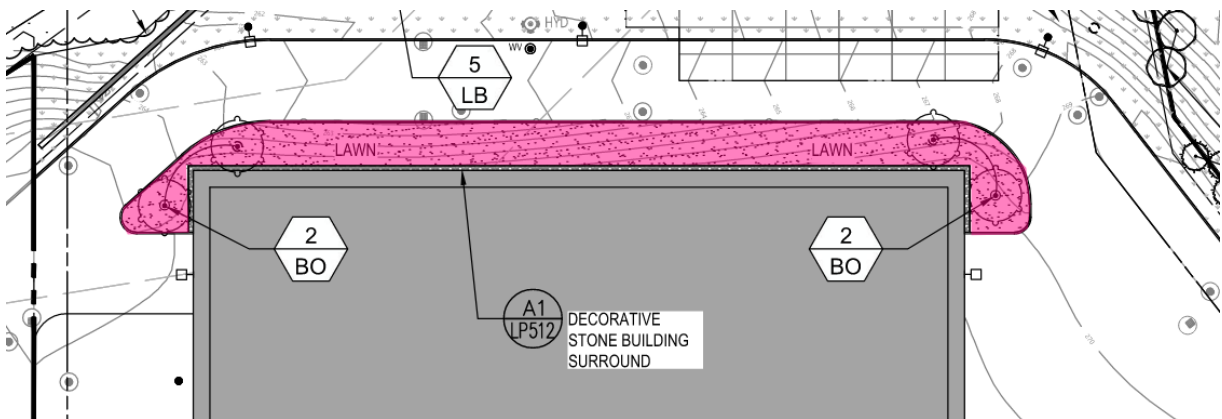
- b) Confirm that 50:50 New England Wetland Plants Wildflower Mix and Erosion Control Mix for dry sites proposed at all areas to be re-graded is appropriate for 1:2.5 slopes. Consider a 100% Erosion Control Mix on steep slopes at or over 1:3, and Meadow Mix in areas under 1:3.

We agree with 100% Erosion Control Mix on steep slopes at or over 1:3, and 100% Meadow Mix in areas under 1:30.

6) 3.04 (8) (g) 3. – Screening

Screening is required to soften the visual impact of buildings, vehicle (car, bus, truck, etc.) parking areas, loading docks, trash disposal areas, exterior storage, and other unsightly areas associated with or generated by a particular development as viewed from Public Ways, residential zoning districts in Devens and host communities, the Open Space and Recreation Zoning District ("Open Space Zoning District"), and the principal entrance of buildings on abutting lots.

- a) The North and East facades of CFS-3 will be visible from the Open Space/Recreation Zoning District. Additional screening plantings are needed along the North façade; proposed lawn and birches on building corners will not provide sufficient screening. Provide a dense mix of evergreen and deciduous trees along this façade to ensure year-round screening.



Per comment #6, and per item (5a), the highlighted area will be planted with deciduous and evergreen trees to help screen the garage. The understory layer will be planted with groundcover and native shrubs to stabilize the slope.

7) 3.04 (8) (n) 2 Landscape maintenance and water management plan

- a) Include the snow storage areas designated by the winter plowing plan in the planting plans to ensure that plantings within the snow storage areas are tolerant of road salt.

Snow storage areas will be referenced on the planting plans.

- b) If permanent irrigation is planned, irrigation water shall be derived from rainwater harvesting or roof drainage, and/or reclaimed greywater to the maximum extent feasible. Options are above ground or underground harvesting tanks, or selecting drought tolerant plants that do not require permanent irrigation. Rainwater harvesting is a practice that benefits exterior uses and interior, and can be useful for indoor non-potable uses in addition to irrigation.

The use of permanent irrigation is pending assessment of feasibility and cost. If utilized, irrigation will be limited to the Central Green (terraces and lawn area) and will comply with DEC rainwater harvesting requirements.

8) General Comment

- a) Combined file was very heavy and crashed PDF viewing software repeatedly. Please plot files without layers, flatten PDFs, and reduce file size as much as feasible.

PDF generation settings will be adjusted to ensure a reasonable file size.

9) LP102 LANDSCAPE PLAN ENLARGEMENT 2

- a) Provide a Site Demolition Plan.

Detailed construction demolition plans have not been developed at this time. At a high level, a note on Sheet C1.01 states that the contractor shall remove and dispose of surface features within the limit of work unless otherwise noted. There are also notes on Sheets C4.00 through C5.02 that clarify the extents of existing utilities to remain within the main access drive.

The planting plan has been developed in coordination with the civil engineer to avoid conflicts with existing and proposed underground utilities.

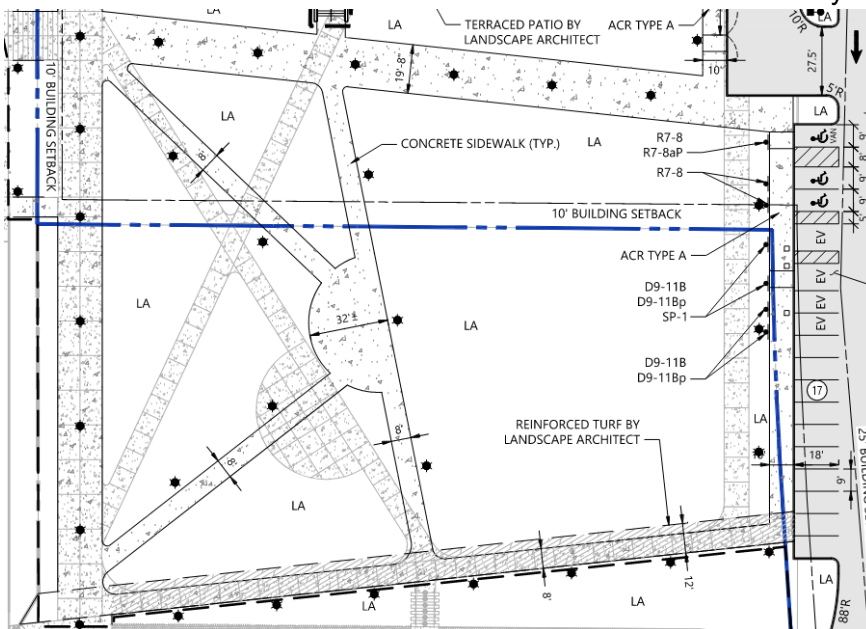
- b) Provide Site Materials Plans and Materials Schedule for entire site.

The Civil Site Layout plans provide the materials for the entire site. The materials are clearly labeled on these plans, which preclude the need for a Materials Schedule.

- c) Please label limit of work line, setback lines, property lines on all plans.

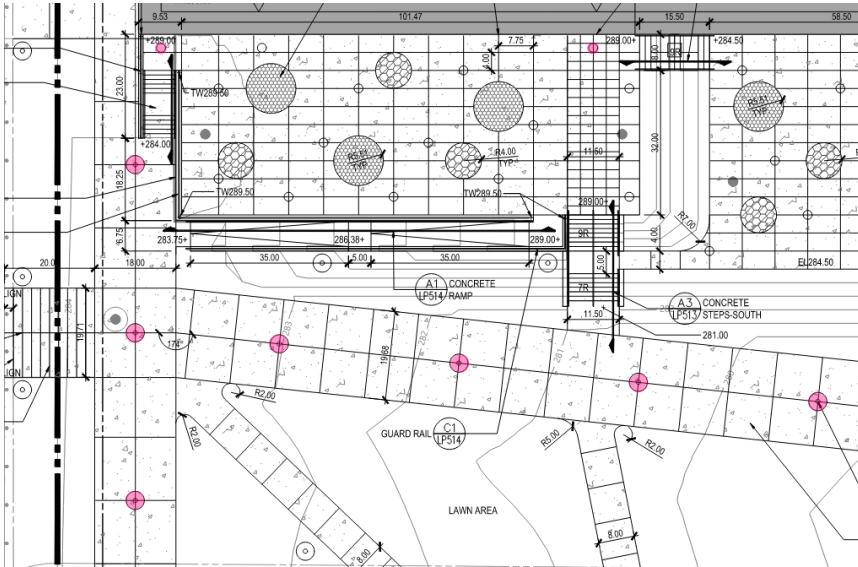
Concur, will be provided.

- d) Some plans currently show proposed quad walkways and screened back walkways, but it is unclear which is correct. Please differentiate between/label the two walkway layouts shown.



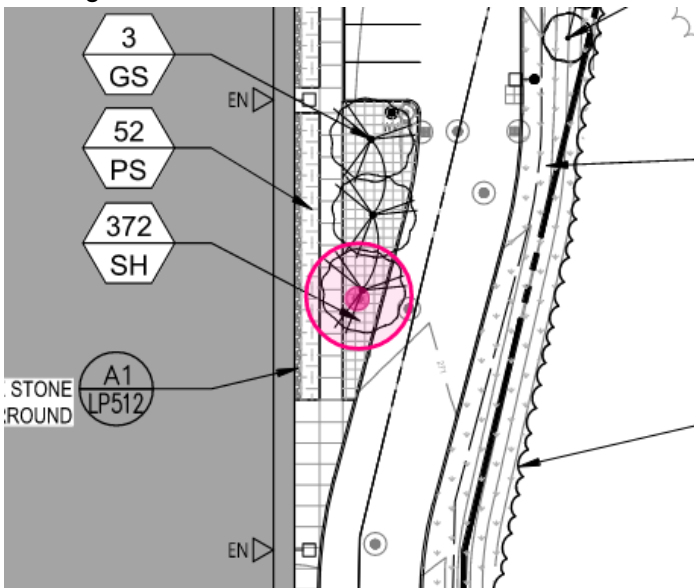
The screened back sidewalk in the campus green was part of a previously permitted design and was included to illustrate the changes proposed by this project. However, we understand that this has caused confusion and will remove the unnecessary linework from the plans.

- e) At terrace and quad south of proposed building, light poles are proposed in the middle of walkways. This layout is not feasible from a maintenance perspective, especially snow plowing. Consider shifting light poles off walkways and off center of path of travel for consistency and ease of maintenance.



The centered lights within the pavement are part of a concept previously approved by CFS to create promenades connecting the campus buildings. These paths are 20 feet wide which offer ample space for snow maintenance on either side of the poles. The concrete bases extend above the paved surface and will help to protect the poles from damage.

- f) There is a potential conflict between 1 Ginkgo and a manhole at planted island on East side of building.



Concur, the tree will be adjusted or removed to eliminate the conflict.

- g) Some planting callouts are missing on planted slope between top and mid terraces south of building, and at southwest corner of building.

Concur, missing callouts will be provided.

- h) Please show Lawn planting hatch on all planting plans as shown in plant schedule, hatch is currently missing from LP102.

Concur, missing hatch will be provided.

10) LP501 LANDSCAPE DETAILS

- a) Provide details for planting on slopes for all proposed planting types.

Concur, details for planting on slopes will be provided.

11) LP502 LANDSCAPE SCHEDULE

- a) Provide Turf Seed application rate and species mix.

Concur, application rate and species mix will be provided.

- b) Consider using a high use lawn seed mix in stabilized turf area.

Concur.

- c) Confirm if a cover crop is being used in all proposed seed mixes, and if yes, confirm the cover crop application rate and species mix.

Cover crop is not anticipated; the specified seed mixtures will be provided on finished grade.

12) Detail A4/LP512 PATIO TREE CIRCLE GRAVEL AREAS

- a) Confirm feasibility and intent of this detail, specifically the use of ½" washed crushed stone, tamped in the tree pit. This media/method as detailed will damage the root ball, deter root growth, and compromise overall tree survival.

CFS-1 documents were provided for continuity with terrace design. The documentation available to us utilized the above-mentioned detail; it seems that this was later changed to groundcover and soil. We will revise our tree pits to include ground cover and soil to match the CFS-1 tree pits.

- b) The adjacent plaza at CFS-1 employs similar tree pit design and layout within its hardscape, and includes groundcover plantings in each tree pit. For continuity across the CFS sites and in the interest of tree longevity it is recommended to plant the tree pits with planting soil and groundcover in lieu of crushed stone and decorative gravel.

CFS-1 documents were provided for continuity with terrace design. The documentation available to us utilized the above-mentioned detail; it seems that this was later changed to groundcover and soil. We will revise our tree pits to include ground cover and soil to match the CFS-1 tree pits.

- c) The health of the trees located within tree pits in the plaza on the south side of the building will be promoted through the installation of interconnected treeways and/or the use of structural soil to increase the growing medium for the trees – striving for the recommended volume of 1200cf per tree.

Neil Angus
Director
DEC

While it is understood that more soil volume will result in more robust trees, due to cost constraints it is not anticipated that we will be providing treeways or structural soil cells at this time. The tree pits were sized generously to allow the trees to thrive without additional measures.

13) LP512-513 Stair and Ramp Compliance.

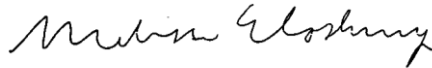
- a) On Sheets LP513 and LP514, Stair and Ramp details do not comply with 521 CMR:
 - i) Details A3, B3, C1, C3/LP513: 521 CMR 27.4.3 Handrail Extensions “*At the bottom, extend at least 12 inches plus the width of one tread beyond the bottom riser.*” Detail shows handrail extension of 12”, which does comply with Federal ADA details, but not with Massachusetts code ***Concur; will revise the details for compliance with Massachusetts code.***
 - ii) Detail A1/LP514: 521 CMR 24.4 Landings “*The maximum length of a ramp run between landings shall not exceed 30 feet.*” Detail shows ramp runs of 35’-0”
Concur; will revise the ramp to limit runs to 30 foot.
 - iii) Detail A1/LP514: 521 CMR 24.5.2 Heights “*Handrails shall be provided in pairs, one at a height between 34 inches and 38 inches.*” Detail shows handrail height at 33-3/4”
Concur; detail will be revised.

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

Arcadis Architects, Engineers and Landscape Architects, a New York General Partnership



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