November 26, 2025

Curtis Quitzau, P.E.
VHB, Inc.
1 Cedar Street, Suite 400
Providence, RI 02903-1023

Re: CFS-3 Level II Unified Permit Application Review Comments (#D25-013)

Dear Mr. Quitzau,
We have completed our initial review of the above-mentioned application. Below are the comments from the DEC and MassDevelopment. Additional review comments on the site plan, geotechnical, traffic, and stormwater from our peer review engineers are being provided in a separate letter.

Please Note: The applicant is encouraged to submit a response to comments using this electronic file. Responses should be added after each comment as individual paragraphs with italicized colored text. Responding in this manner will improve clarity and context of responses and will expedite review time.
Applicant team responses in RED text submitted 12-4-25

DEC Staff Comments (Determination of Completeness Comments and Misc.):

1. Include existing trees over 12" caliper along limit of work to clearly identify which trees are to remain and which are to be saved. Look at small grading shifts if possible to preserve more existing mature and healthy vegetation for screening purposes.

   Response: Existing trees over 12" caliper that are at average or excellent health have been added to the plans along the eastern edge where there may be opportunities to adjust grading.

2. Please provide details on building material and color selections, finishes, glazing, etc. that have been factored in to reduce building visibility from nearby residential areas. Provide details on the parking garage design strategies to reduce light pollution, noise, and visibility.

   Response: The building material for the manufacturing building will be predominately painted, precast concrete panels to align with the overall campus palette. The color selections will include a few shades of gray, ranging from medium light to dark. The material and color of the parking structure will be all precast concrete and will contain color additive to match the medium gray tone utilized on the main office building. It is the design team's opinion that the gray tones of the entire structure will blend well with the natural vegetation as seen from the northeast and east parcels, especially during the winter months.

   The parking garage will be an open structure as defined by the Massachusetts State Building Code. The required uniform openings on the east, north, and west sides have been designed to the code minimum, which will result in a solid concrete half wall around the entire perimeter. The wall height will be approximately 44" above the tier floor, which is well above the average height of the headlight on an average car. The average automobile headlight is typically around 24 to 26 inches from the ground to the center of the lamp. Additional screening landscaping material will be planted at garage perimeter (see response to Arcadis comments 5 and 6) which will help to reduce light spillage and reduce noise. In regard to garage lighting, the design team has studied

the impacts of the parking garage's lighting package. Please see attached memo dated December 2, 2025.

In an effort to reduce outward light spillage, a window film will be applied to the entirety of all the windows located on the east facing side of the manufacturing building and north of the gridline E. The film will be a gray frost, translucent film that will provide security and low transmittance of light.

3. Design Review letter from MassDevelopment required.

   Response: A Design Review letter from MassDevelopment is in progress and will be forwarded to you when received.

4. Project involves work on adjacent parcels owned by Commonwealth Fusion Systems. Provide confirmation letter/email from owners of 105 and 111 Hospital Road for associated site work/construction laydown.

   Response: This letter is attached to this response memo.

5. Include details for limits of disturbance, proposed temporary grading and stabilization, duration of use, and restoration for laydown areas on 105 Hospital Road Parcel. More detail on phasing is needed (parking, access routes, temporary sediment bays, soil stockpiles, etc..);

   Response: Since Oak St will be shared among both construction teams please refer to the information provided with the latest CFS-4 applicant responses to comments.

6. Revise Stormwater management design narrative to include statement certifying that the project complies with the requirements of 974 CMR 3.04(4), Stormwater Management Design Standards, and 974 CMR 4.08, General: Stormwater Management, along with Engineers stamp/signature.

   Response: A statement will be added to the stormwater management narrative that certifies that the project complies with the requirements of 974 CMR 3.04(4), Stormwater Management Design Standards, and 974 CMR 4.08, General: Stormwater Management, along with the stamp of a Professional Engineer.

7. Provide irrigation details and include rainwater harvesting details to off-set irrigation demand, or use drought tolerant landscaping and eliminate permanent irrigation.

   Response: 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. Utility lines shown but pipe material type not shown for all utilities. Provide details on utility yard elements, including height and quantities of chemical storage.

   Response: Pipe material notes are present on Sheet C1.01. They have also been added to the relevant Grading, Drainage, and Utility plans for clarity. Height and quantities of tank yard chemical storage will be added to the Site Plans.

9. Please Include an updated response to the Electromagnetic Interference (EMI) assessment for CFS-2 and Magnetic Fields at Devens memo from Commonwealth Fusion Systems, dated 01/15/25, that includes a cumulative assessment of CFS-1 through 4.

   Response: The updated EMI assessment is in progress and will be provided upon completion.

10. Provide listing of proposed chemicals and quantities to determine if a License for Flammables, Combustibles, and/or Explosives is required. Due to accumulating quantities of chemicals and hazardous materials, a more formal SPCC Plan may be required for this site.

    Response: This is being compiled and confirmed and will be provided.

11. Provide details for utility pad areas, patio, and parking garage areas, including lighting.

    Response: The level of detail shown on the plans represents the current level of design of the project. This is a very broad comment. If additional construction detail is needed to demonstrate compliance with state or DEC regulations, please direct us or provide added specificity to this comment.

12. Lighting plan shows wall pack lights. You mentioned these were to be removed to reduce visibility of building at night. Overall lighting levels are good but there are a number of "hot spots with footcandles over 2.7-10.0. Look for additional opportunities to reduce lighting levels and use similar controls that are being proposed for CFS-4.

    Response: Wall pack lights are provided at specific locations on the facility, particularly over the egress doors, in locations where the site does have enough space to provide poles to meet minimum illumination requirements. These wall packs are intended to remain in the design. Note that they are mounted at 10' height, and will not be visible from the residential properties, as existing grade between properties obscures these views (CFS-3 site is down lower). There is one L11 light mounted at 21'-6" for the overhead delivery door on the northeast corner of CFS-3. This light will be on a switch so that it is only turned on when needed.

13. The traffic impact assessment was reviewed under CFS-4 and additional comments will be forthcoming under separate cover on 12/1/25.

    Response**:** Noted

14. We are awaiting submission of an updated sound study from CTS that includes all existing and proposed campus buildings.

    Response: Noted. This campus-wide sound study will be provided upon completion.

15. The proposed stockpile west of the 69 KV utility line – are there options for filling under the power line and extending existing slopes around the CFS 2 and 4 building areas to reduce tree clearing? The survey of trees should encompass this entire area (in addition to the property line area that has been previously discussed). Look at options reducing stockpile size by creating berms on the property and reduce the extent of tree disturbance near the slopes.

Response: There may be options to reduce the volume of excess soils somewhat, but the projects are going to generate a significant volume of excess topsoil that has to be stockpiled on site at this location. Applicant's only other location with significant area is on the Oak St parcel, but that area is considerably more valuable to CFS as real estate for campus expansion than this area west of CFS-2. We understand and appreciate the benefits of tree preservation, but a tree survey of this area will make no difference in the outcome since we must also comply with the soils management aspect of the Devens rules and regs.

16. Soil stockpiling is not shown at the Oak parcel and needs to be determined to ensure balanced site and minimization of impacts to forested areas. Please confirm if soil stockpiles intended to be permanent and clarify access routes for soil stockpile areas.

    Response: Please refer to the information provided with the latest CFS-4 applicant responses to comments pertaining to use of Oak St and limits of disturbance.

Devens Utilities:

Utility Plans C5.01 and 5.02:

1. The size and pipe materials proposed for water mains and water services to the building and the parking garage are not shown on the plans and should be added.

   Response: Pipe material notes are present on Sheet C1.01. They have also been added to the Utility plans for clarity. Water main and service sizes have also been added to the Utility Plans.

2. I didn't see a water service shown on the plans that goes into the CFS-3 building. A stub may have been left for this in a previous CFS project.

   Response: The water service for CFS-3 is located at the southwestern corner of the building near the exterior bike racks. It is served off of a main built as part of CFS-2. Clarifying labels will be added to the Utility Plans.

3. A water shutoff valve should be added to the water service line to the parking garage so the water feed to each building can be shut off, if necessary, without having to shut off a portion of the water main loop around the buildings.

   Response: Water shut off valves have been added to the service lines.

Sewer Profile 1, Plan C5.03:

4. SMH 909: The proposed grade at SMH 909 increases the depth of the manhole to >18', which is not ideal. I realize the manhole is deep so the sewer pipe between SMH 909 and the existing downstream manhole can fit under a 30" RCP drainpipe. But can the proposed grade, which is being raised by about 7' from the existing grade there, be adjusted lower to reduce the overall depth of SMH 909?

   Response: Point taken. We believe our design intent is clear, and we have demonstrated a feasible route for a gravity connection to the existing sewer. We will assess alternatives and revise drawings

during final design of CFS-3, and in consideration of construction schedules for both projects and constructability constraints in relation to the parking garage.

5. The sewer pipe from SMH 809 to MH 909 is shown entering SMH 909 about 7' above the bottom invert of SMH 909. Pipe connection requires an interior drop manhole connection in SMH 909.

   Response: Agreed. We have added the requested note to the plan.

Please provide any responses and supporting information to these and all peer review comments by **December 11, 2025**. In the meantime, feel free to contact me with any questions.

Sincerely,

Neil Angus, FAICP, LEED AP
Director
Devens Enterprise Commission

cc: Mike Gerhardt, Leggat McCall Properties
David Robbins, Pivotal
Jessica Strunkin, CFS