

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

33 Andrews Parkway
Devens, MA 01434
neilangus@devensec.com

Date: 23 December 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

Arcadis Architects, Engineers and
Landscape Architects, a New York
General Partnership
1 Federal Street
Suite 3800
Boston, MA 02110
United States
Phone: +1 617 896 2500

www.arcadis.com

Dear Neil,

Arcadis has reviewed the comment responses and second drawings submittal for 125 Hospital Road – Level 2 Unified Permit Application Documents dated 11 December 2025, including the following supporting documents:

- 25-1202 Garage Light Study.pdf
- CFS Visual Impact Supplemental_Photosim_12-5-2025_reduced.pdf
- Level 2 Permit Rev 1 - Site Plans - December 2025.pdf
- Turning Movements_12-5-25.pdf
- CFS Site Section_Visual Impact Assessment_11-11-2025.pdf
- 9419-125HPL_20251107-ARCA-RES2-body.docx

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.

General notes for the applicant

All responses shall be provided on the applicant's own letterhead. The Word documents are provided for convenience of the applicant to respond to the comments and shall not be edited in any way, particularly not to include the digital signatures of another firm.

Provide screen shots, or other specific references to the comment responses. Either directly in the response letter, or by some other method, rather than simply providing updated plans. This will save the applicant time and effort in reviewing plans and comment letters that are not clearly referenced to one another.

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.

Applicant Response:

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

ARCADIS COMMENT – 2025-12-23:

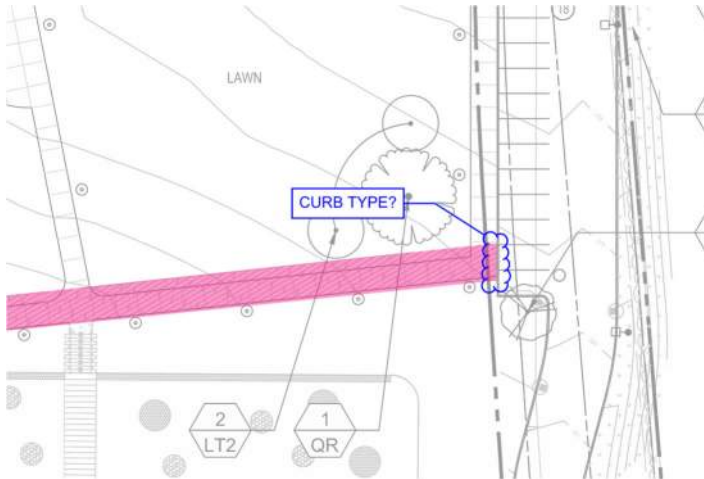
Existing and proposed landscape features such as street trees, fences, walls, planting areas, wooded areas, and walks. Scattered trees to be preserved shall also be shown as well as all "specimen trees" (trees exceeding a minimum caliper of 12" within 100' of existing or proposed lot lines have been 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.

- a. 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 to extend a minimum of 12" beyond the dripline of trees. Provide a description of the excavation methods within rootzones of trees to remain.
- b. The tree protection lines are not accurate as shown on the plans, as certain construction activities cannot be accomplished without cutting through dripline/root zones of existing trees if show at true size in plan. 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.
- c. 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, or as otherwise directed by DEC representative. Our understanding is the DEC has granted a waiver for the 100' dimension but requests all trees with driplines affected by the Limit of Work shall be documented on all plans. This shall include those inside and outside the Limit of Work.
- d. 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.

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.



Applicant Response:

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.

ARCADIS COMMENT – 2025-12-23:

Noted.

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.

Applicant Response:

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.

ARCADIS COMMENT – 2025-12-23:

Noted.

- b) Proposed and existing trees to remain shall be included on site lighting plans and photometrics to ensure no conflicts.

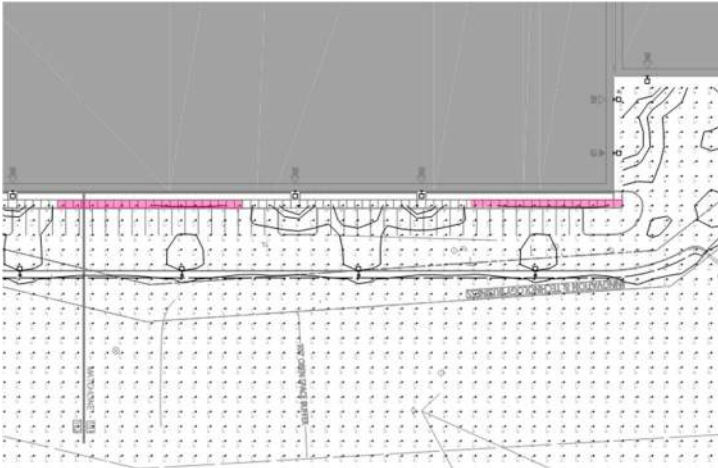
Applicant Response:

Concur, proposed and existing vegetation will be added to the plans.

ARCADIS COMMENT – 2025-12-23:

Comment is not addressed. The symbols are added, but do not factor into the lighting levels/contours. The photometric plans are the same as before the trees were added.

- 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):



Applicant Response:

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.

ARCADIS COMMENT – 2025-12-23:

Suggest this could be better achieved with low level pedestrian-scale bollards, also with motion / daylight sensors to avoid additional glare and light pollution of wall packs on the building.

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.

Applicant Response:

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.

ARCADIS COMMENT – 2025-12-23:

Noted.

- b) Proposed and existing trees to remain shall be included on site lighting plans and photometrics to ensure no conflicts.

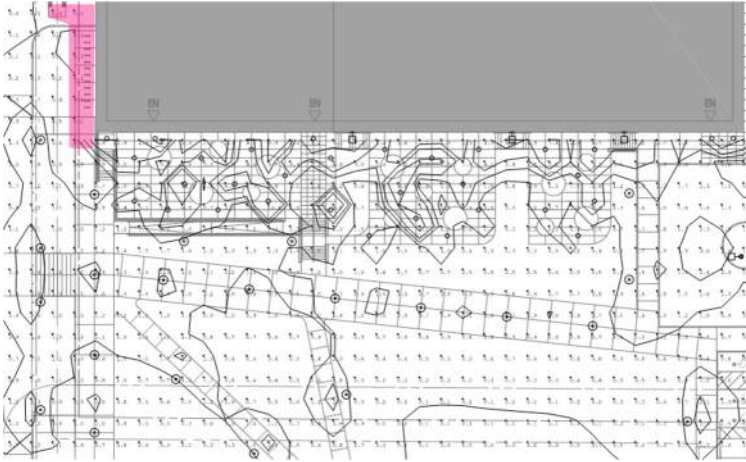
Applicant Response:

Concur, proposed and existing vegetation will be added to the plans.

ARCADIS COMMENT – 2025-12-23:

Comment is not addressed. The symbols are added, but do not factor into the lighting levels/contours. The photometric plans are the same as before the trees were added.

- 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:



Applicant Response:

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.

ARCADIS COMMENT – 2025-12-23:

Suggest this could be better achieved with low level pedestrian-scale bollards, also with motion / daylight sensors to avoid additional glare and light pollution of wall packs on the building.

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:

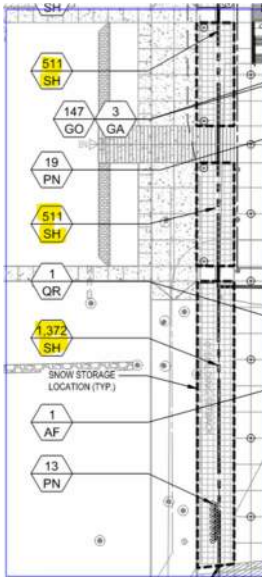
- i) *Ilex opaca*
- ii) *Rhododendron carolinianum*
- iii) *Sporobolus heterolepis*

Applicant Response:

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

ARCADIS COMMENT – 2025-12-23:

Sporobolus monoculture remains and is specifically called out as snow storage areas which concentrates the de-icing chemicals. Revise and resubmit for review.



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.

Applicant Response:

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

ARCADIS COMMENT – 2025-12-23:

As noted earlier, Provide screen shots, or other specific references to the comment responses. Either directly in the response letter, or by some other method, rather than simply providing updated plans.

This will save the applicant time and effort in reviewing plans and comment letters that are not clearly referenced to one another.

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.

Applicant Response:

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.

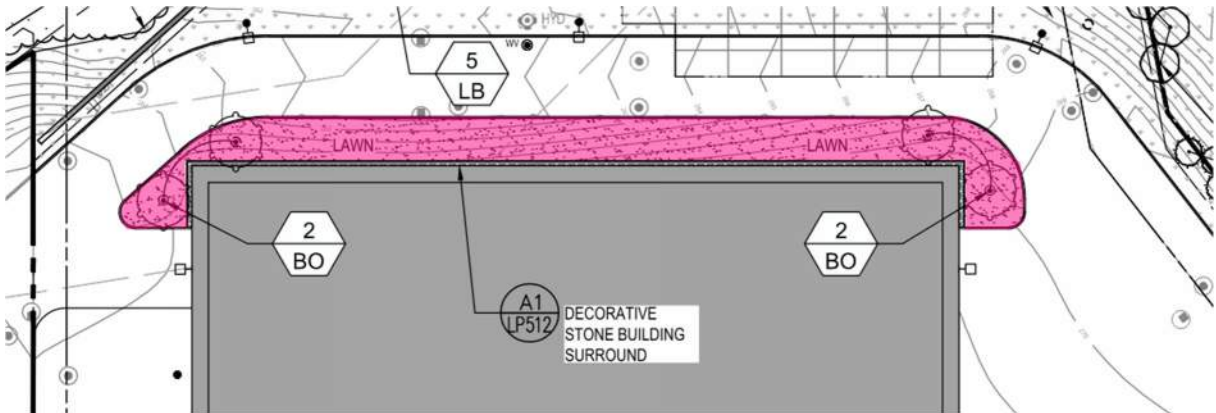
ARCADIS COMMENT – 2025-12-23:

Noted.

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.



Applicant response:

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.

ARCADIS COMMENT – 2025-12-23:

Noted.

- 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.

Applicant response:

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

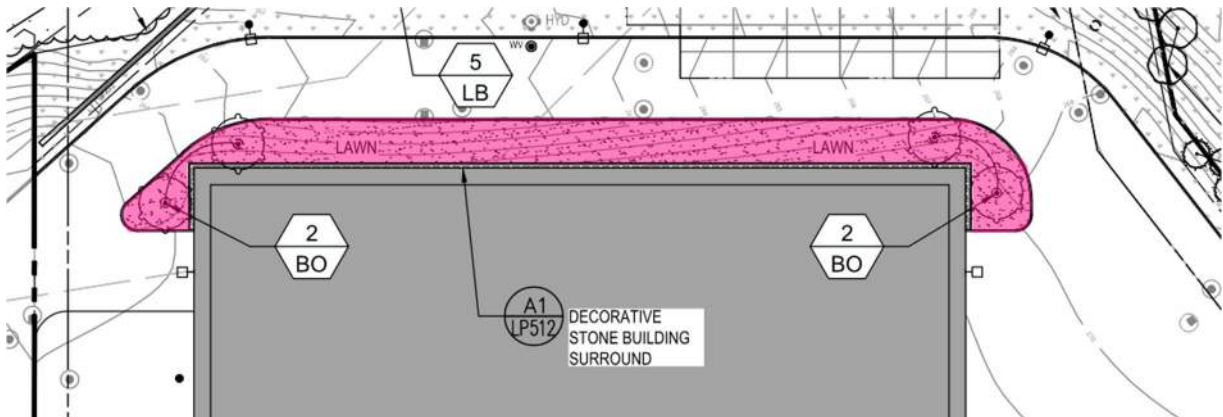
ARCADIS COMMENT – 2025-12-23:

Noted.

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.

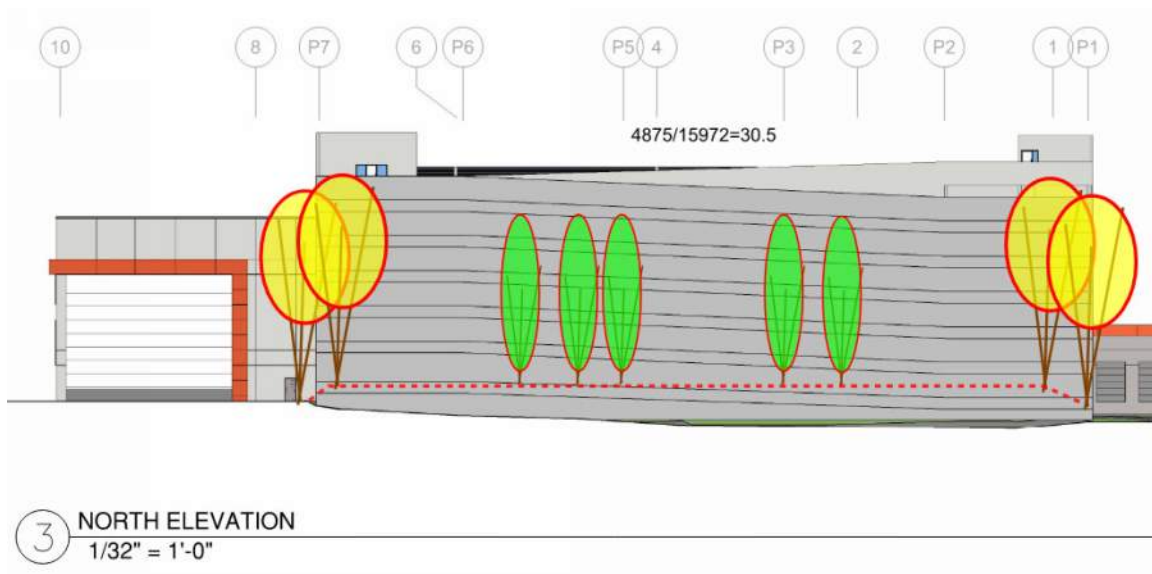


Applicant Response:

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.

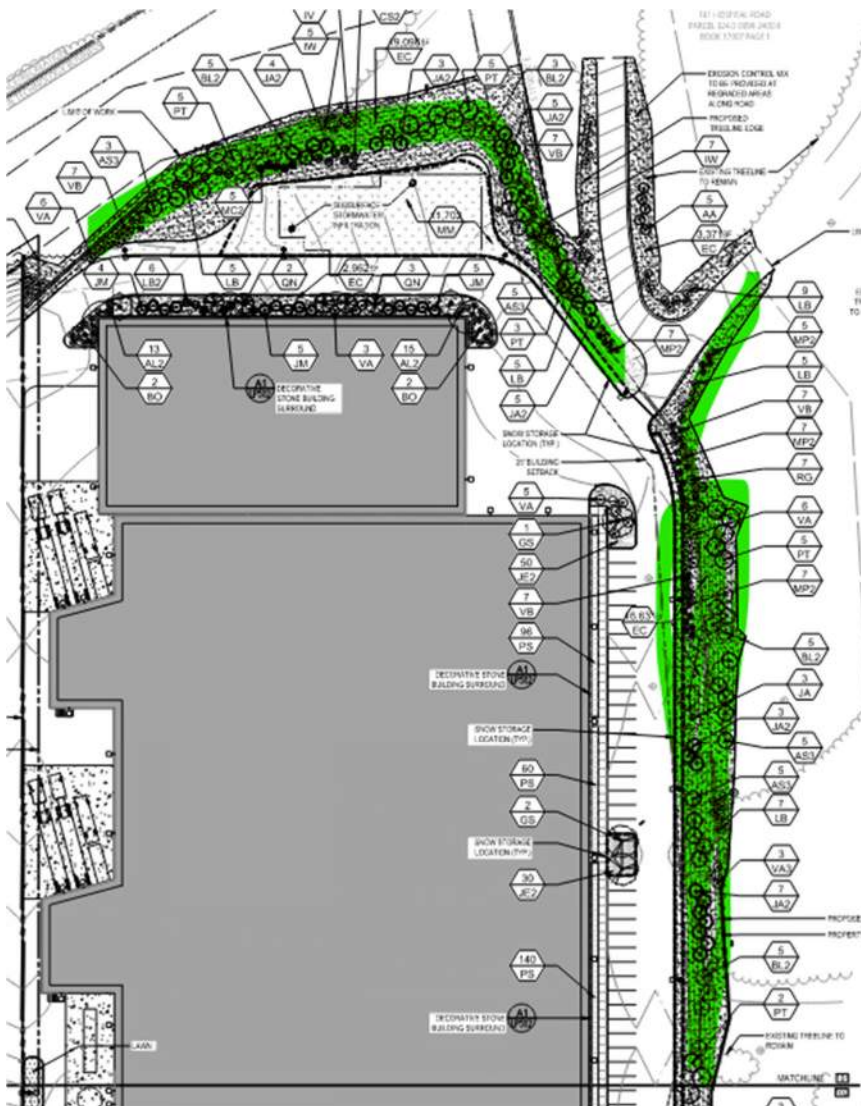
ARCADIS COMMENT – 2025-12-23:

The *Betula* species selected seems too large for the location, likely growing into the garage and overhanging the truck route. The proposed evergreens are either underrepresented in plan scale, or too small to be effective as a screen. Suggest the applicant add the proposed buildings screening materials to the sheet PL-1 – PL-3 to effectively convey the screening solutions.



There seems to be an opportunity to increase the density of large evergreen planting on the north and east sides of the parking garage outside the vehicular circulation zones. As submitted, there is only one genus of evergreen in the plant schedule, *Juniperus*, both of which are varieties/cultivars. Our understanding is the DEC encourages planting of straight species to allow for the best chance of survival. Consider this for other plant selections as well. Indicating the trees in plan at 70-80% mature spread would also help to reinforce that the screening approach will be effective. Show mature height and spread in the plant schedule for all selections.

The need for additional screening in this area is reinforced by the proposed lighting levels within the garage. Though lower than the first iteration, the lighting levels within the garage still far exceed those required by DEC. Even if the levels are reduced further, it will be important to screen the light pollution from surrounding residential areas.



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.

Applicant Response:

Snow storage areas will be referenced on the planting plans.

ARCADIS COMMENT – 2025-12-23:

Most of the areas indicated do not seem feasible for storage but are rather narrow strips to accept regular plowing. Applicant shall accept that excess snow from plowing shall be removed from the site if the allotted areas for snow storage are inadequate. *Sporobolus* monoculture remains and is specifically called out as snow storage areas which concentrates the de-icing chemicals. Revise and resubmit for review.

- 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.

Applicant 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.

ARCADIS COMMENT – 2025-12-23:

Noted.

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.

Applicant Response:

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

ARCADIS COMMENT – 2025-12-23:

Layers are still included in the pdfs. Please check before submitting the drawings for review.

9) LP102 LANDSCAPE PLAN ENLARGEMENT 2

- a) Provide a Site Demolition Plan.

Applicant Response:

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.

ARCADIS COMMENT – 2025-12-23:

Refer to 974 CMR 3.04: Design Standards8.(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. All trees within the setback of a minimum 12" caliper must be identified on all plans.

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.
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.

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.

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

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

Applicant Response:

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.

ARCADIS COMMENT – 2025-12-23:

Non-concur; detail are provided for rails, stairs, bike rack, lighting, etc., but are not annotated on the landscape plans. Reconcile the detail locations with the correct discipline, licensed professional, or provide callouts, and legend, for landscape materials.

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

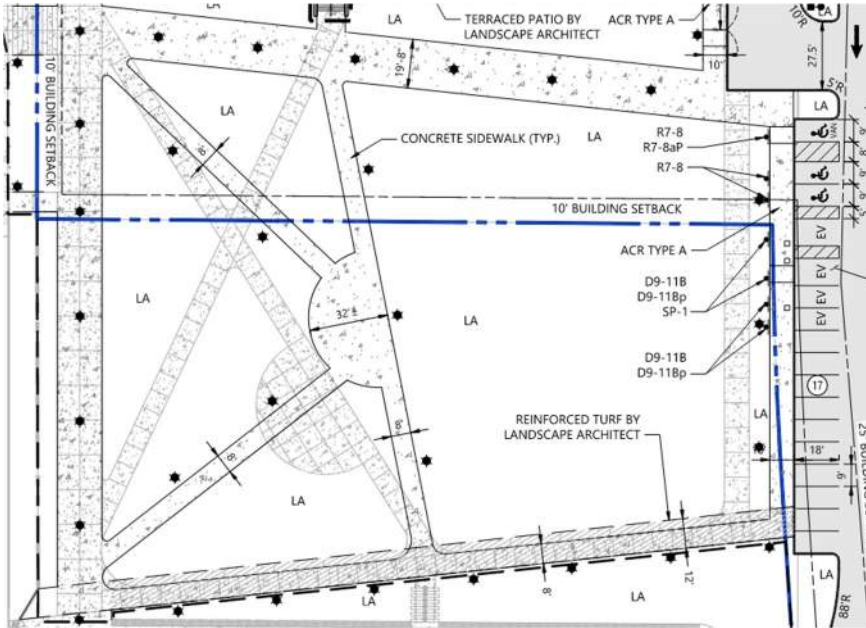
Applicant Response:

Concur, will be provided.

ARCADIS COMMENT – 2025-12-23:

Non-concur; Limit Of Work is not provided on the landscape plans.

- 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.



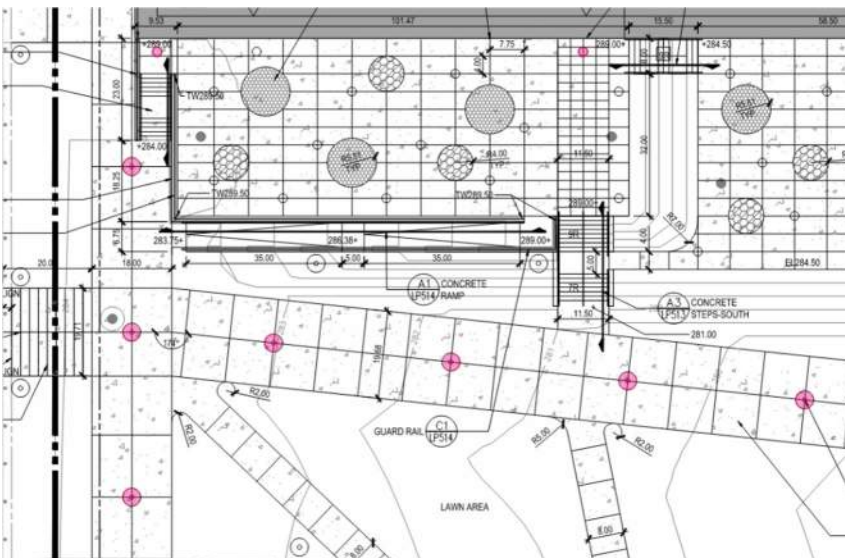
Applicant Response:

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.

ARCADIS COMMENT – 2025-12-23:

Noted.

- 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.



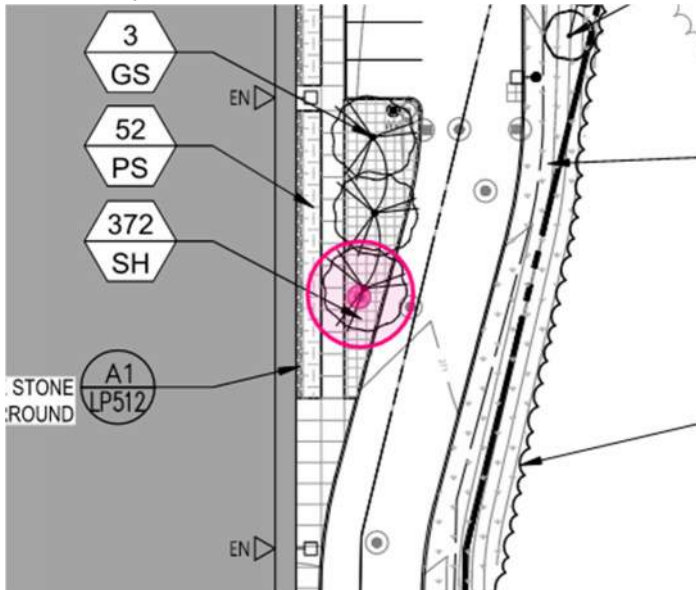
Applicant Response:

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.

ARCADIS COMMENT – 2025-12-23:

Noted.

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



Applicant Response:

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

ARCADIS COMMENT – 2025-12-23:

Noted.

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

Applicant Response:

Concur, missing callouts will be provided.

ARCADIS COMMENT – 2025-12-23:

Noted.

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

Applicant Response:

Concur, missing hatch will be provided.

ARCADIS COMMENT – 2025-12-23:

Noted.

10) LP501 LANDSCAPE DETAILS

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

Applicant Response:

Concur, details for planting on slopes will be provided.

ARCADIS COMMENT – 2025-12-23:

Noted.

11) LP502 LANDSCAPE SCHEDULE

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

Applicant Response:

Concur, application rate and species mix will be provided.

ARCADIS COMMENT – 2025-12-23:

Noted.

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

Applicant Response:

Concur.

ARCADIS COMMENT – 2025-12-23:

Noted.

- 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.

Applicant Response:

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

ARCADIS COMMENT – 2025-12-23:

Noted.

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.

Applicant Response:

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.

ARCADIS COMMENT – 2025-12-23:

Noted.

- 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.

Applicant Response:

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.

Neil Angus
Director
DEC

ARCADIS COMMENT – 2025-12-23:

Noted.

- 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.

Applicant Response:

The tree pits were sized generously to allow the trees to thrive without additional measures.

ARCADIS COMMENT – 2025-12-23:

Noted.

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

Applicant Response:

Concur; will revise the details for compliance with Massachusetts code.

ARCADIS COMMENT – 2025-12-23:

Noted.

- 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”

Applicant Response:

Concur; will revise the ramp to limit runs to 30 foot.

ARCADIS COMMENT – 2025-12-23:

Noted.

- 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”

Applicant Response:

Concur; detail will be revised.

ARCADIS COMMENT – 2025-12-23:

Noted.

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



James Kros, PLA, ASLA
Sr. Associate
Email: james.kros@arcadis.com
Direct Line: 617 896 2500



Melissa Eloshway, PLA
Landscape Architect
Email: melissa.eloshway@arcadis.com
Direct Line: 617 896 2500