



November 4, 2025

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

Re: CFS-4 Level II Unified Permit Application Review Comments (#D25-012)

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 11-18-2025.

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

1. Lighting levels are excessive within and surrounding the equipment pads, tanks, and stacks. 974 CMR 3.04(6)(a)3. And 974 CMR 4.04 allow for 0.5 footcandles. While it is understandable that some increased light levels may be necessary within utility areas, these drastic changes in lighting levels could create more safety issues that they solve by creating blind spots between brightly lit areas and low-level lighting areas. In addition, pavement/foundation colors may add to potential light pollution through reflectivity. Please revisit lighting levels across the project. All efforts to minimize excessive exterior lighting levels should be considered to avoid light pollution and potential nuisance conditions and comply with 974 CMR 3.04 and 4.04 please also ensure to include lighting on planting plan and ensure there are no conflicts with proposed landscaping.

Response: The design team has reevaluated the lighting approach adopting a multi-tiered strategy to comply with the DEC's comments on facility light levels.

Comprehensive changes :

- Reduce lumen output of pole and wall mounted fixtures to lower average footcandle levels across the site to comply with 974 CMR 4.04.
- Fixtures will be Dark Sky compliant to reduce light pollution.
- Provide integral louvers on pole mounted fixtures, this will reduce backlight spill onto adjacent properties and also reduce glare and visible brightness from abutting residents.
- Implement controls strategy through networkable sensors integral to each fixture. Sensors will allow for motion and time of day control. Separate strategies will be implemented based on time of day (normal hours and after hours).

- During normal hours fixtures will dim to 50% of full output when no motion is detected. Will come to full brightness when motion is detected.
- During after-hours operation fixtures will turn off when no motion is detected. Will come to 50% of full output when motion is detected. For security purposes select fixtures will remain at 10% of full output when no motion is detected and come to 50% of full output when motion is detected.
- Manual override switch will bring fixtures to full bright for maintenance safety lighting.

Normal Operations: 7am – 11pm

- In Operation
 - Exterior lighting will be general site lighting for deliveries and normal operation and site activities, fixtures to be designed to cut off light at property lines and no vertical uplighting.
- Not in operation
 - Low level security/site lighting, fixtures to be designed to cut off light at property lines and no vertical uplighting.
 - Low level minimum foot candles for egress lighting.

Daily Outside of Normal Work Hours 11pm-7am

- In operation - typical
 - Exterior lighting will be low level and under access platform lighting, with specific task lighting at areas of services and measurement.
 - Service lighting would be locally operated for immediate locations of repair.
- Not in operation
 - Low level security/site lighting, fixtures to be designed to cut off light at property lines and no vertical uplighting.
 - Low level minimum foot candles for egress lighting.

Operations of Site Construction and Unscheduled Maintenance

- Infrequent - Full site lighting, full illumination for site security and safety during site construction activities, OSHA level lighting for worker safety

2. Sound study: The MassDEP noise report submitted as part of the application did not include anything but CFS-4. As you are aware, there have been extensive discussions about how CFS-4 would work with the existing CFS-1 and 2, as well as the pending CFS-3 project. Prior to submittal of this application, a separate study provided and discussed during our 9/15 zoom meeting, included Vibrasures CFS-1 and 2 results plus shielding from CFS-3 but no CFS-3 sound sources. A comprehensive updated sound study is required that addresses the Vibrasure errors and omissions and includes both CFS-4 and CFS-3 sound sources, operational details, and any proposed mitigation necessary to demonstrate compliance with 974 CMR 4.05 at all times. Please provide an update on the status of this report.

Applicant Team Response: The report will be revised and updated in accordance with recent discussions with your peer review consultant.

3. Visual Impact Assessment is expected by November 6, 2025. Please ensure this includes CFS-3 as well.

Applicant Team Response: The visual impact assessment is underway for both the CFS-4 and CFS-3 projects. Draft site sections were submitted on 11/4/2025 for your initial review and discussion, and based upon that feedback the design team has undertaken a two-step approach to assessing potential visual impacts on nearby existing and planned homes for both the CFS-3 and CFS-4 projects, concurrently. The first-step was a study of site cross sections to assess the extent to which either project could be viewed based on topography and to a lesser extent existing vegetation. This was updated to include an additional site section, assess seasonal variation and additional sight lines.

This step of the study concludes that the CFS-4 site will be entirely obscured from view of existing and future homes by the construction of CFS-3 and the parking garage. Therefore, as far as CFS-4 is concerned, visual impacts to existing homes, if any, would be short term for 8-10 months until vertical construction of the CFS-3 project has gotten underway.

The second step of the study now underway will utilize GPS and virtual reality photo simulation techniques to assess the degree to which existing vegetation will fully or partially screen the CFS-3 project.

4. Air Emissions are being reviewed by Tech Environmental. Additional comments will be forthcoming. While we understand the process has switched from water cooling to air cooling, which will eliminate steam emissions, please verify whether or not there will be any visible emissions from the stack or any other equipment at any time during the year.

Applicant Team Response: We understand - we will wait for the additional comments. We expect no visible emissions from the stack or any other equipment.

5. The traffic impact assessment is currently under review. We are awaiting submission of the Traffic Report Appendix prior to finalizing comments.
6. Applicant Team Response: The traffic study appendix was submitted by email on 11-3-2025. Peer review comments were forwarded to our team on 11/14 and are under review. We will provide responses as expeditiously as possible.

7. Provide final Geotech report once completed.

Applicant Team Response: The final Geotechnical Report is submitted herewith.

8. Submit copy of the LEED Green Building Rating System Project Checklist with the Location and Transportation, Sustainable Sites, and Water Efficiency Categories completed. Remainder of scorecard to be completed at time of building permit application.
<https://www.usgbc.org/resources/leed-v41-bdc-scorecard>

Applicant Team Response: The LEED checklist as requested was submitted to your office by email on October 26, 2025.

9. Revise Stormwater management design narrative to include a statement 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 and ensure this statement is stamped and signed by the civil engineer of record.

Applicant Team Response: This will be provided with the final report submission following resolution of peer review comments.

10. Confirm waste management and recycling are accommodated on-site and/or not required for this project.

Applicant Team Response: Yes, waste management and recycling is accommodated on site. These are located and labeled at the north end of the north equipment pad – see drawing C3.01 Layout and Materials Plan.

11. Please provide turning movements for both Fire apparatus that will be accessing site.

Applicant Team Response: Completed and included in the updated site plans.

Devens Utilities:

Utility Plan C5.01:

1. The size and pipe materials proposed for water mains and water services to the Annex building and the CFS-4 building are not shown on the plan and should be added.

Applicant Team Response: Water line materials are defined on sheet C1.01 as Class 52 cement lined ductile iron. This note has also been added to drawing C5.01 for clarity. Pipe sizes have also been added.

2. A water shutoff valve should be added to the water service lines for the Annex and CFS-4 buildings 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.

Applicant Team Response: Water service shut off valves have been added to the plans.

Sewer Profile Plan C5.02:

3. SMH 907: The proposed grade at SMH 907 increases the depth of the manhole to >18', which is not ideal. I realize the manhole is deep so the sewer pipe between SMH 907 and the existing downstream manhole can fit under a 30" RCP drainpipe. But can the proposed grade be adjusted lower to reduce the overall depth of SMH 907?

Applicant Team 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 in coordination with the design of CFS-3, and in consideration of construction schedules for both projects and constructability constraints in relation to the parking garage.

4. The sewer pipe from SMH 806 to MH 907 is shown entering SMH 907 about 7' above the bottom invert of SMH 907. This pipe connection will require an interior drop manhole connection in SMH 907.

Applicant Team Response: Agreed. We have added a note to the plan.

Please provide any responses and supporting information to these and all peer review comments by **November 18, 2025**. In the meantime, feel free to contact me with any questions.

Sincerely,

Neil Angus, FAICP, LEED AP
Director
Devens Enterprise Commission

cc: Kyle Metzroth, Project Manager, CFS



DEVENS ENTERPRISE COMMISSION
33 Andrews Parkway • Devens, MA 01434 • Phone: (978) 772-8831 • Fax: (978) 772.8831