

# Staff Report

Devens  
Enterprise  
Commission

**Date:** August 21, 2025

**To:** Devens Enterprise Commission

**From:** Neil Angus, FAICP Director

**RE:** 18 Independence Expansion - Level 2 Unified Permit (#D25-006)

<b>Applicant</b>	MassDevelopment
<b>Owner:</b>	Mack Devens Development, LLC/SMC
<b>Engineer:</b>	McCarty Engineering
<b>Location:</b>	18 Independence Drive, Devens
<b>Zoning:</b>	Rail, Industrial, and Trade-Related Uses and Watershed Protection Overlay District

**Premises and Proposed Project:** The Applicant is seeking a Level 2 Unified Permit (site plan and building permit) for a proposed +/-62,000 s.f. expansion of their existing +/-324,500 s.f. gross square foot industrial building. The western half of the building was occupied by Werfen, who has now moved into 11 Grant Road. SMC is in the process of planning for expansion of their facilities in the eastern half of the building and will be needing additional space to accommodate their growth in business. The proposed building expansion will be in the existing parking lot and loading dock area. The project includes new parking, stormwater management, landscaping, and utility infrastructure. Truck access will continue to be provided via Independence Drive with a new curb cut. A new curb cut is being proposed off of Saratoga Boulevard for passenger vehicle/employee parking as well, to separate truck and employee parking.



The complete application was circulated to MassDevelopment and the DEC Peer Review team: Nitsch Engineering (site plan, stormwater, and traffic), Arcadis (landscaping), and Tech Environmental (light, noise,

electromagnetic interference). Revised plans were submitted to by the Applicant on August 6, 2025 to address initial review comments. The following is a summary of the project review and remaining issues:

### **Zoning Summary:**

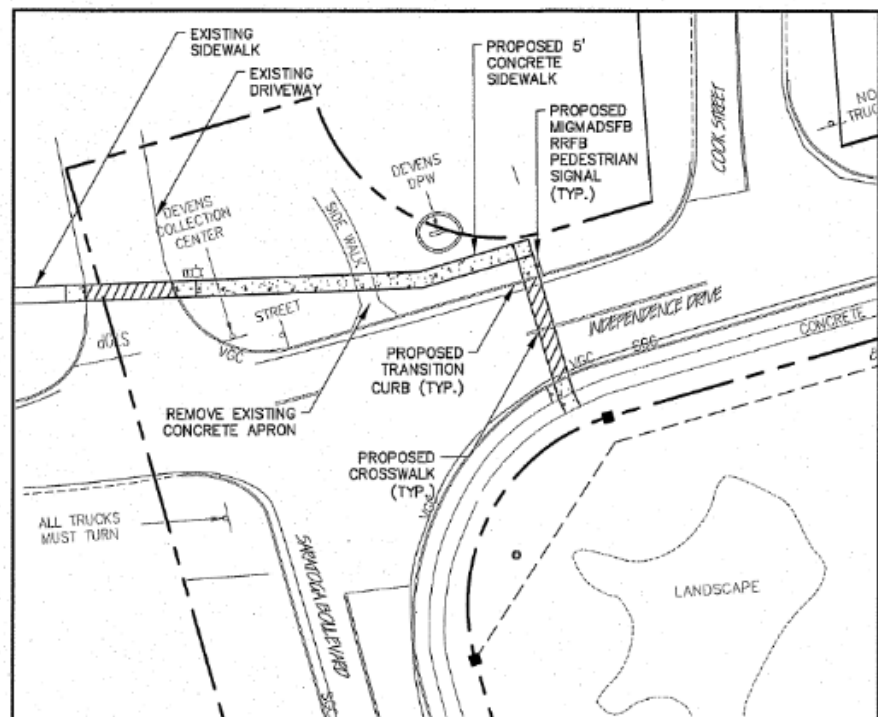
SMC is a medical device manufacturer and they will be expanding their existing operations. Bio-manufacturing uses are permitted in the Rail, Industrial, and Trade Related Uses District. The existing parcel is 21.6 acres, exceeding the two acre required minimum and has well over 100' of frontage on both Saratoga Boulevard and Independence Drive. The proposed addition is outside of all the required front, side and rear yard setbacks. Because the proposed building expansion is being located on an existing paved loading dock and parking lot area, the overall increase in impervious is fairly minor given the size of the expansion (1.08 acres or 47,045 sq.ft.). The Zoning table on Sheet 5 of the plan set has a number of discrepancies that the Applicant will need to address on the final plan set.

### **Site Access/Traffic:**

Access to the site will continue from Independence Drive, however the Applicant is proposing to separate truck and employee vehicle access by providing a new curb cut off Saratoga Boulevard exclusively for trucks. The proposed project will reduce the number of existing loading docks from 13 to 6. Shipping hours will be reduced from 6AM to 6PM to 8AM-5PM. This, in addition to a number of site design features (mentioned later in this report) will help reduce any potential nuisance conditions for nearby residential neighbors.

For bike and pedestrian access, there is an existing concrete sidewalk along the entire frontage of this parcel. A proposed crosswalk and sidewalk extension in front of the Devens DPW building will connect this sidewalk network to the rest of Devens. Rapid flashing beacons will be installed at the crosswalk to help improve pedestrian safety at this intersection. The Applicant has included a full sidewalk

connection from the main building entrance to Independence Drive. This should be included in the limit of work for the project. A sidewalk should also be added to the Saratoga side connecting the new parking area with the public sidewalk for safer pedestrian flow through the parking areas.



**SIDEWALK IMPROVEMENT DETAIL**

1"=30'

### **Parking/Loading Docks:**

As the addition is going on top of the existing parking and covering 13 of the existing loading docks, employee parking will be shifted to the Saratoga Boulevard side and the loading docks will be reduced to 6 and be located on the side of the new addition and behind the front of the existing building. While the loading docks will be facing the road, they are set back and will be adequately screened. 974 CMR 3.04(6)(a)(5) requires loading docks be located to the sides and rear of buildings and shall not be located forward of the front facade of the building. The Applicant's

proposed layout, with screening technically complies. DEC should be prepared to make a finding to this effect in the Record of Decision.

The total number of employee parking spaces (62) will increase the overall total site parking by 38 (0.6 spaces per 1000 sq.ft. for the addition). There are over 300 existing parking spaces in front of the building off of Independence. The total number of spaces for the site, when the expansion is complete, will be 419 (0.94 spaces per 1000sq.ft.). This is well below the maximum amount of parking allowed (752 spaces). The Applicant has indicated that this is more than sufficient parking for their needs as employees will be spread across different shifts, thus all the spaces will not be occupied at one time and allow the spaces to be used by visitors during various times of the day. If demand for parking were to increase, the Applicant would have to consider structured parking. To help reduce the need for parking and single-occupancy vehicle trips, the Applicant has included dedicated carpooling spaces. Devens On-Demand shuttle service is also available for employees within 20 miles of Devens. Electric vehicle charging spaces have also been included. If the DEC is satisfied that the number of parking spaces is adequate, it should include a finding to that effect in the record of decision.

While the regulations restrict the amount of parking between the building and the roadway, the existing building location limits the Applicant's options. A waiver has been requested for the 62 new spaces between the building and Saratoga Boulevard. The Applicant has designed the addition with a combination of topographic and vegetative cover to screen both the parking and loading docks. This will help reduce any potential nuisance conditions for nearby residential neighbors.

***Industrial Performance Standards:***

To help avoid potential nuisance conditions, the Applicant has designed the facility with consideration for the surrounding land uses. The closest sensitive receptors are the residential units along Auman and Bates Street. As part of the past building expansion at 66 Saratoga Boulevard, the existing Open Space and Recreation buffer between Saratoga Boulevard and Bates Street Service Road was raised by approximately 5 feet and a ~20' high berm was installed with excess fill material to help buffer all industrial Park activity and Saratoga Boulevard traffic from nearby residences. The Applicant has designed the proposed addition to reduce the number of loading docks, however they will be oriented towards the residences. To balance the site from a soil management perspective, and to help screen the loading docks and parking, the Applicant has proposed a 12' high landscape berm that will be heavily planted. This will be 18' above ground from the loading dock areas.

Based on the design of this proposed expansion, the rooftop mechanical units were identified as the major potential noise sources. A sound study was prepared by Acentech and reviewed by the DEC's sound consultants (Tech). The Applicant is currently evaluating a number of factors to address projected noise from the facility operations:

1. Type of rooftop equipment (lower noise generating equipment)
2. Localized noise barriers on select rooftop equipment.
3. Operational restrictions

As of the writing of this report, an updated sound study has not been provided. An updated report is necessary prior to acting on this application to ensure compliance with 974 CMR 4.05. From a lighting perspective, the proposed site lighting plan includes fully shielded, downward directed black light fixtures with 3000K and appears to comply with 974 CMR 3.04 and 4.04. The lighting plan should be revised to include timing of illumination (commercial and industrial property lights may only be illuminated between 11 p.m. and 7 a.m. if the DEC determines lights are needed to ensure safety for night operations on the premises). The Applicant should also specify energy efficiency measures including but not limited to timers, daylight sensors and higher albedo ground surfaces/treatments to reduce number of fixtures required. The luminaire schedule should also specify the 3000K requirement to ensure reduced lighting intensity.

***Landscaping/Screening:***

As discussed, to help screen the loading docks and parking, the Applicant has proposed a 12' high landscape berm that will be heavily planted. Planting quantities and species need to be verified. There are opportunities to preserve more existing trees along Independence Drive. Existing trees to remain need to be clearly shown on all plans with properly scaled tree protection (drip line). A planting plan for the proposed landscape islands is required (not just mulch). Salt-tolerant species are required where snow stockpiling is proposed. The Applicant should include additional plantings to meet the screening requirements and address the use of non-native species. Additional various minor edits are required to the landscaping and erosion and sediment control plans to ensure full compliance with 974 CMR 3.04(8).

***Stormwater Design:***

The conversion of the existing parking and loading dock area to building area will result in cleaner stormwater runoff that will be infiltrated via an on-site subsurface infiltration system under the loading dock area. The Applicant has revised the design of the system to meet the DEC's green field requirement through the combination of porous pavement for the new employee parking spaces, the subsurface infiltration system, and overflow basin to the south of the new parking area. The system meets the 90% Total Suspended Solids (TSS) and 60% Total Phosphorous (TP) removal requirements of the DEC regulations and complies with the on-site infiltration and Low-Impact Development requirements of 974 CMR 3.04 and 4.08.

The Applicant has provided a draft stormwater operations and maintenance plan that will need to be formally updated for the facility to address the new stormwater management features such as sub-surface infiltration, porous pavement, infiltration basin, as well as new landscaping and screening that will need to be maintained to preserve required screening.

***Public Safety:***

An additional hydrant was added near the fire connection to the building at the request of Devens Fire Department to provide adequate fire service. Fire Truck turning movements were added to the to ensure safe emergency access. As shown on Sheet 10, the proposed driveway is designed to the minimum required for the WB-67 to enter and exit the facility. The Devens Aerial fire apparatus is a smaller vehicle than a WB-67 so there is adequate emergency access. An emergency gate will be provided between the new employee parking and the loading docks to keep truck and passenger vehicles separate but still allow for emergency access. The Applicant has a facility safety plan that will be expanded to include this new addition.

***Greenhouse Gas Regulatory Requirements:***

The Applicant has already joined the Devens Eco-Efficiency Center and included Electric Vehicle charging stations and priority parking spaces for carpooling and fuel-efficient vehicles, which will aid in reducing GHG emissions from the transportation sector. Sidewalk connections and installation of bike racks will provide additional opportunities for multi-modal transportation options that will help reduce vehicle trips and transportation-related emissions, as well as promote employee health and wellness.

***Design Review:***

The design of the building is subject to the Devens Industrial Park Design Guidelines and requires review and approval from MassDevelopment. As of the writing of this report, the Applicant was finalizing the architectural drawings and will provide MassDevelopment with a rendering for their review and approval prior to the public hearing.

***Waiver Requests:***

The Applicant has updated their waiver requests to include the following:

***974 CMR 3.04(3)(a)1.a. requires parking to be located to the rear and sides of buildings, with only visitor, handicap, and preferential parking in front of the building.***

Due to the lot having two frontages (Saratoga and Independence) and the layout of the existing building, 51 of the 62 proposed parking spaces do not meet this requirement (there are 11 accessible and preferential parking spaces that are compliant). The proposed new parking is being screened from the public right of way through a combination of earthen berms and landscaping. The Applicant has increased the amount of vegetation to provide better screening, therefore, staff has no concerns with this waiver request for the 51 new spaces.

***974 CMR 4.08(4)(g) requires a falling head soil permeability test in retention/infiltration basins before the basin design in all basins and infiltration structures.***

The Applicant's drainage analysis is based on the Static Method, which under the Massachusetts Stormwater Handbook, does not require a falling head permeability test to be performed, but instead is based on the Rawl's Rates. The Rawl's Rates are derived through a standard deep hole soil observation. DEC Peer Review Engineers agree with this approach given the soil conditions on site.

***974 CMR 4.08(4)(f) requires that the floor of all basins/infiltration structure/swales a minimum of four feet above the high groundwater elevation.***

Testing was conducted within the limits of the proposed underground infiltration system and the Applicant used the depth of the hole as the assumed groundwater elevation and provided a 2' offset to groundwater in accordance with the MADEP Stormwater Handbook. The Applicant also provided a mounding analysis demonstrating that the mound stays within the limits of the proposed basin and will have no impact on the basin storage 72 hours after the rain event. In addition, the Applicant is maintaining the elevation of bottom of the existing at-grade infiltration swale that they are connecting to. This existing trench is well below 4 feet and historically does not retain any standing water. Given the sandy soil conditions, the Applicant has met this requirement to a practicable extent.

**Process:**

Mack Devens Development LLC, submitted a Level II Unified Permit application package on July 3, 2025. The pre-permitting conference was completed on June 30, 2025 and the Determination of Completeness was issued on July 10, 2025. Copies of the application and plans were received by the surrounding Towns on July 10, 2025. Legal notices were placed in Nashoba Publications on July 25, 2025 and August 1. Certified Mail notice was sent to all abutting property owners on July 10, 2025. The 30-day public comment period expired on August 11, 2025. No public comments were received. The public hearing opens on August 26, 2025. The 75-day review period ends September 23, 2025.

**Recommended Action:**

Staff recommends that the hearing be continued to the September 11, 2025 meeting at 7:30AM to provide additional time for the Applicant to finalize the sound study and resolve the remaining civil and landscaping review comments and for staff to prepare a draft record of decision for the commission's consideration.

**Attachments:**

18 Independence Original Submission:

- [Compiled Drainage Report](#)
- [Stamped Site Plans](#)
- [Application Package](#)
- [Determination of Completion \(DOC\)](#)

Revised Plans and Review Comments:

- [Independence Dr 18 SMC Expansion Revised Plans](#)  
(includes updated peer review comments and revised plans)