Memorandum

To: Mr. Neil Angus
Director/Land Use Administrator
Devens Enterprise Commission
33 Andrews Parkway
Devens, MA 01434

Date: 12/3/2025

Project #: 14867.01

From: Matt Kealey, PE, PTOE
Senior Project Manager

Abigail Sheusi, EIT
Transportation Consultant

Re: Traffic Impact and Access Study - Response to Comments

VHB has reviewed the comment letter from Nitsch Engineering, dated November 7, 2025, related to the Traffic Impact and Access Study (TIAS) assessing the CFS-3 and CSF-4 developments combined in Devens, MA presented to the Devens Enterprise Commission. This memorandum summarizes the comments made by Nitsch Engineering on their review of the TIAS and provides a response to each outstanding comment, where required.

Each of Nitsch Engineering's comments are listed below followed by the response by VHB. Additional pertinent data and analyses are provided in the Attachments to this document.

Nitsch Engineering Comment #1*: Nitsch requests the Applicant confirm if a site visit was conducted to observe the study intersections and roadways, particularly during peak hours presented in the TIAS; collect information on traffic patterns; and conduct sight distance measurements for access to/from the Project.*

> **VHB Response: Multiple site visits have been conducted over the course of the CFS development. Sight distance measurements were conducted as part of the 2021 Traffic Impact and Access Study (TIAS). This evaluation showed that the available Stopping Sight Distance (SSD) far exceeded the minimum requirements. This evaluation also showed that the Intersection Sight Distance to the east of the westerly driveway and to the west of the easterly driveway fell short of the desired distance due to vegetation overgrowth. Limited clearing of this vegetation was recommended as part of the 2021 TIAS. Because no changes were proposed to the two site driveways as part of the current development, additional sight distance measurements were not conducted. However, it should be noted that the reconstruction of the Hospital Road/Givry Street intersection has since been completed, which creates two new sight lines. It appears that the reconstruction will improve the two sight lines that fell short of the desirable ISD measured as part of the 2021 ISD. VHB will conduct updated sight distance measurements for these two conditions in the Spring and will work directly w/ CFS Facilities to identify and implement roadside vegetation management, if necessary .**

Nitsch Engineering Comment #2*: Nitsch notes in Table 7 of the TIAS that 70% of traffic is distributed to Jackson Road; however, no Automatic Traffic Recorder (ATR) counts were conducted along Jackson Road. We recommend the Applicant collect 48-hour ATR data and compare the percent increase in volumes on Jackson Road as a result of the Project.*

VHB Response: In the absence of ATR data on Jackson Road, VHB estimated the percent increase in traffic associated with the Project based on peak hour TMCs for the intersection of Jackson Road and Patton Road. The estimated site-generated traffic on Jackson Road north of Patton Road is 25 new trips during the weekday morning peak hour and 31 new trips during the weekday evening peak hour. This represents an increase of 1.4 percent and 1.8 percent, respectively. It should be noted that the 2025 Traffic Monitoring Program includes ATR counts on Jackson Road north of Patton Road. This report is currently being reviewed by MassDevelopment. When available, VHB can use this data to calculate the percent increase on a daily basis.

Nitsch Engineering Comment #3*: Nitsch notes that the ATR counts collected for the TIAS include speed data as shown in the appendix. We recommend the Applicant include the 85th percentile speeds in Table 1 to supplement the existing traffic volume summary. We request the Applicant clarify if the speed data was used to conduct any further assessment on safety, including comparison of 85th percentile speeds to existing speed limits, sight distance evaluation, and Project access points.*

VHB Response: As mentioned in Response 1, Sight distance measurements were conducted as part of the 2021 TIAS. This study used 85th percentile speeds of 39 mph eastbound and 38 mph westbound. The December 2024 speed study showed 85th percentile speeds of 38 mph eastbound and 36 mph westbound. Also stated in Response 1, VHB will conduct updated sight distance measurements to reflect current geometric conditions associated with the reconstruction of the Hospital Road/Givry Street intersection.

Nitsch Engineering Comment #4*: Nitsch notes the Turning Movement Counts (TMC) collected for the TIAS were taken in December and may not reflect pedestrian and cyclist volumes when compared to data collected in warmer months. During Nitsch's site visit, we observed higher volumes of pedestrians and cyclists than were reflected in the TMCs, especially at the intersection of Front Street and Hospital Road during school dismissal for the Ayer Shirley Regional Middle School, located approximately 1 mile west from the Project Site on Hospital Road. We recommend the Applicant collect additional pedestrian and cyclist data in the Spring or Fall when school is session to compare to data collected for the TIAS, and recommend if pedestrian or cyclist improvements are warranted at any of the study intersections.*

VHB Response: Of the current workforce at CFS, there are very few employees who walk or bike to work. As the CFS campus is built out, we do not anticipate a significant increase in employees who walk or bike t work. As such, improvements to pedestrian and bicycle infrastructure would not be driven by the Project. The 2025 Traffic Monitoring Program mentioned in Response 1 includes spring 2025 counts at several study area intersections. When the report is available, VHB can use this data to compare bicycle and pedestrian counts as mentioned in this comment.

Nitsch Engineering Comment #5*: During Nitsch's site visit, Nitsch noted there are bike lanes and a sidewalk that are not detailed in the intersection descriptions of Grant Road at Pine Road. We request the Applicant acknowledge the pedestrian and bicycle accommodations and a clarify if any other intersection descriptions need to be updated to understand existing transportation within the study area.*

VHB Response: VHB acknowledges the presence of a bike lane and sidewalks at this intersection. It does not appear that any other intersection descriptions need to be updated.

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Nitsch Engineering Comment #6: *In Figure 4, Nitsch notes the southbound through volume on Jackson Road at Givry Street is stated as 9 vehicles, which is consistent with the TMC counts but is very low and does not balance with the through volumes on Jackson Road arriving and departing the intersections of Jackson Road at Pine Road to the north and Jackson Road at Lake George Street/Patton Road to the south. We acknowledge that several driveways exist that could contribute to the imbalance; however, we request the Applicant clarify if this volume is correct, and, if applicable, provide the revised volume, and updated traffic operations and safety analysis if needed.*

VHB Response: This appears to be an anomaly in that particular count. VHB reviewed previous count data for this intersection and made adjustments to the southbound movement. The revised volumes and analyses are provided in the Attachments.

Nitsch Engineering Comment #7: *Nitsch verified the status of the Background Projects listed in Table 3 during Nitsch's site visit. Based on our observations, we noted the Background Projects that were fully constructed and currently occupied included 11 Grant Road, 35 Saratoga Boulevard, and the Grant Road residential units. We also observed other developments in Table 3 that are not constructed include 57-75 Jackson Road, 31 Independence Drive, and the residential units on Goddard Street. Based on Nitsch's site observations of land advertisements and research on the MassDevelopment website, Nitsch notes the following properties subject to development near the study area include 63 Hospital Road, 205 Jackson Road, 4 Grant Road and 25 Pine Road. No further action is required.*

VHB Response: No response required.

Nitsch Engineering Comment #8: *Nitsch recommends the Applicant clarify how the trip distribution and trip assignments for the Background Projects were derived to develop the No-Build condition traffic volumes, and provide specific documentation from the Background Projects, if available.*

VHB Response: Site generated vehicle volume networks from the 2022 VHB Traffic Study for 57/75 Jackson Road are provided in the Attachments to this memo. Calculation estimates for all other background projects are also provided in the Attachments to this memo.

Nitsch Engineering Comment #9: *Nitsch notes CFS-2 was not included as Background Project in Table 3. Nitsch requests the Applicant clarify if CFS-2 was fully operational at the time of the traffic data collection in December 2024.*

VHB Response: Based on discussions with CFS, certain systems are still being commissioned and some areas are still under construction. However, the majority of CFS-2 employees are already working elsewhere on site and there is not expected to be a significant increase in CFS-2 employees on site moving forward.

Nitsch Engineering Comment #10: *Nitsch notes that the trip generation calculations were based on the Institute of Transportation Engineers' (ITE) Trip Generation Manual, 11th Edition, which was the most recent edition available at the time the TIAS was submitted. Nitsch notes that around the date of completion for the TIAS, the ITE Trip Generation Manual, 12th Edition, was released in September 2025. Nitsch requests the Applicant perform a Trip Generation comparison for weekday daily, weekday morning, and weekday evening peak hours and compare to the information in Table 4. If the number of peak hour vehicle trips increases significantly, an update to the Traffic Operations Analysis may be required.*

VHB Response: While the Appendix material includes some prior comparisons to 11th Edition projections, VHB clarifies that the actual trip generation projections summarized in Table 6 are based on 12th Edition rates. As such, the capacity analysis provided in the TIAS are based on the latest information.

Nitsch Engineering Comment #11*: Nitsch notes based on Comment 10 above, if the number of projected Daily trips exceeds 1,000 vehicles per day, additional state permitting such as Massachusetts Environmental Policy Act (MEPA) may be required. Nitsch notes that the Site may be contained within an Environmental Justice (EJ) population with the "Minority" criteria. If additional permitting is required, the Applicant should acknowledge what permit(s) may be required so the Town is aware of potential next steps if the Project were to receive local approval.*

VHB Response: As noted in Response 10, the trip generation projections were based on the latest ITE Trip Generation Manual. The Devens Reuse Plan went through MEPA review and the project is accounted for within the approved Devens development program. Please contact MassDevelopment if you require more specificity on MEPA history.

Nitsch Engineering Comment #12*: Nitsch notes that CFS-3 comprises 90,000 square feet (SF) of office space with 203,000 SF of research and development (R&D) and manufacturing space, while CFS-4 comprises 45,000 SF of R&D space. We note the Trip Generation assigns both buildings under Land Use Code 140 – Manufacturing. We request the Applicant provide a description of and compare trips for other potential applicable relevant land uses, including LUC 710 for General Office Building and LUC 760 for Research and Development Center.*

VHB Response: CFS is a unique use that functions primarily as a manufacturing facility. As part of the trip generation evaluation conducted in the TIAS, VHB determined based on the actual driveway counts that the trip rates matched up best with LUC 140 (Manufacturing) using employees as the independent variable. VHB feels that using the average employee count provided by CFS and the observed driveway volumes provides the most accurate estimation of trip generation rates for the site.

Nitsch Engineering Comment #13*: During Nitsch's site visit, Nitsch noted a significant heavy vehicle operation presence near the development due to the highly commercialized setting of the study area. The ATR traffic counts show a truck percentage as high as 5% on Hospital Road approximate to the easterly site driveway. Table 6 summarizes the trip generation for the overall vehicular trips; we request the Applicant provide trip generation calculations for heavy vehicles entering and existing the Site during the weekday daily, weekday morning, and weekday evening peak hours and clarify the impacts on operations and safety of the study intersections.*

VHB Response: With SPARC equipment arriving on site and other ongoing construction activity, CFS expects current truck activity and truck activity in the near future to be higher than what is expected when the campus is fully constructed and operational. The expected reduction in truck activity compared to the current construction activity is expected to slightly improve operations and safety in the future. To estimate truck trip generation for typical operations of the Project, VHB provides the following breakdown based on ITE LUC 140 (Manufacturing) for 150 employees consistent with the methodology used in the TIAS.

Table 6 Proposed Trip Generation

Time Period	Movement	Total New Trips [a]	Vehicles	Trucks [a]
Weekday Daily	Enter	225	199	26
	Exit	225	200	25
	Total	450	399	51
Weekday Morning Peak Period	Enter	27	24	3
	Exit	9	7	2
	Total	36	31	5
Weekday Evening Peak Period	Enter	15	14	1
	Exit	29	27	2
	Total	44	41	3

a Based on ITE LUC 140 (Manufacturing) using regression rates and using 150 employees as the independent variable. Peak hour rates are based on peak hour of adjacent street.

Nitsch Engineering Comment #14: *During Nitsch's site visit, Nitsch observed the existing parking deficiency at the Site and overflow employee parking along the side of the roadways within the study area, and in the temporary construction lot. Additionally, during the afternoon peak hour, we observed private shuttle buses and a chartered Montachusett Regional Transit Authority (MART) bus shuttling CFS employees to offsite parking lots throughout the hour. Nitsch acknowledges the shuttle buses may not have been operational at the time of the TIAS, but requests the Applicant conduct the following:*

- *Coordinate with CFS to determine if there is any planned overlap between the shuttle program and the building opening while the parking garage is under construction;*
- *Incorporate offsite parking and overflow employee parking outside of the designated employee parking lot into existing parking demand; and*
- *• Clarify the presence of shuttles when driveway counts were taken and clarify how this may impact the Driveway Counts used in Table 5.*

VHB Response: Based on discussions with CFS, the shuttles were operational at the time of the counts. CFS stated that the garage will be the first thing constructed and will be available for on site parking before CFS-3 is completed. If use of the offsite lots is discontinued, this would lead to increased volumes at the driveways but is not expected to have a significant impact on driveway operations.

Nitsch Engineering Comment #15: *The CFS-3 Site Plans show a total of 657 proposed parking spaces, including a 600-space garage and 57 surface spaces. Based on 2 spaces per 1,000 gross square feet (GSF) (as noted in the Site Plans), this exceeds the requirements of 589 spaces for CFS-3 by 68 spaces. However, based on the existing parking shortage, we observed the amount of proposed parking may not accommodate the existing overflow. Furthermore, internal coordination with the Town recommended a larger garage than what was proposed by the Applicant. We recommend the Applicant to provide a parking generation assessment using ITE Parking Generation, 5th Edition and confirm whether the proposed parking capacity is sufficient to meet the Town zoning bylaws and the recommended ITE Parking Generation Rates.*

VHB Response: Based on discussions with CFS, and as stated in the TIAS, CFS has an average attendance of 607 employees on site with an expected increase of 100-150 employees over the next 3-5 years. As currently proposed, the campus will provide 970 spaces on site, which should be more than adequate. In addition, if parking capacity becomes an issue, CFS could construct additional surface parking on the Oak Street parcel.

Nitsch Engineering Comment #16*: During Nitsch's site visit, Nitsch noted the westerly site driveway accommodates employees while the easterly site driveway accommodates visitors. Based on the paragraph under Table 7, the TIAS notes that 75% of trips would use the westerly site driveway and 25% would use the easterly site driveway. We request the Applicant clarify if there will be any restriction between employees and visitors, and if the distribution between the easterly and the westerly site driveways would need to be modified as a result.*

VHB Response: There are no restrictions on which driveways can be used by employees and visitors. The signs at the driveways simply indicate the easiest access to the parking areas designated for employees and visitors.

Nitsch Engineering Comment #17*: As described in the Planned Roadway Improvements, Nitsch noted that the reconfiguration of the Hospital Road and Givry Street intersection was recently reconstructed as a stop-controlled T-intersection. New sidewalk was constructed on the east side of Givry Street and the north side of Hospital Road between the westerly and easterly site driveways. We request the Applicant confirm any additional safety or capacity improvement features that were implemented as part of the reconstruction.*

VHB Response: In addition to the features noted in the comment, a crosswalk will be provided across the westbound approach. The overall design of the intersection represents a significant improvement to safety in this area. By converting three intersections into a single T-intersection, there is a reduction in conflict points, improved sight lines, and a clearer designation of who has the right of way.

Nitsch Engineering Comment #18*: For the level of service (LOS) operations of the Hospital Road and Givry Street intersection in Table 10, the Givry Street southbound approach is shown to operate with significant delay, volume-to-capacity ratio, level of service, and 95th percentile queue during both the No-Build and Build conditions. During Nitsch's site visit during the weekday evening peak hour we did not note any significant queuing or operational deficiencies. As a result, the results in Table 10 and the observations indicate operations at this location could vary widely, and we request the Applicant include the Hospital Road and Givry Street intersection as part of the Transportation Monitoring Program referenced in the TIAS, and coordinate with the Town to provide further mitigation to alleviate any future delay and queuing as a result of the Project.*

VHB Response: The applicant will agree to add this intersection to the monitoring program.

Nitsch Engineering Comment #19*: During Nitsch's site visit, we observed a shared-use path recently constructed on the west side of Jackson Road and running between Grant Road and St. Barbara Street. We request the Applicant acknowledge this as an additional pedestrian accommodation present in the TIAS study area and to coordinate with the Town on its effect to nearby study intersections like Givry Street and Jackson Road, where a roundabout is currently being considered as proposed roadway improvement as referenced in Future Roadway Conditions on Page 20.*

VHB Response: VHB acknowledges the presence of the shared-use path. If the design of a roundabout for the intersection of Givry Street and Jackson Road advances, a connection between the shared-use path and the roundabout should be considered.

Nitsch Engineering Comment #20: *Nitsch observed the intersection of Jackson Road and Lake George Street/Patton Road during the weekday evening peak hour and noted the traffic queues/operations to be most critical at the southbound approach of Jackson Road, where we observed the queues extending up to 1200 feet. Our site observations indicate operations at this approach in the evening peak hour to be more critical than the LOS C operations depicted on Table 9. We recommend the Applicant to work with the Town to implement the necessary signal timing adjustments and vehicle detection improvements, if necessary, to accommodate additional vehicle trips as a result of the Project.*

VHB Response: The Applicant will work with the Town to implement traffic signal timing improvements at this intersection if deemed necessary.

Nitsch Engineering Comment #21: *Nitsch observed the signalized intersection of Jackson Road and Lake George Street/Patton Road operates with an exclusive pedestrian phase, which was not included in the timing plans of the Capacity Analysis worksheets in the appendix. We request the Applicant clarify the absence of the exclusive pedestrian phase in the traffic analysis and indicate the impact that implementing the exclusive pedestrian phase would have on traffic operations and safety.*

VHB Response: Based on the traffic signal plan for this intersection, there is an exclusive pedestrian phase. However, based on the traffic counts there were zero pedestrian crossings observed. As such, the pedestrian phase was not included in the analysis.

Nitsch Engineering Comment #22: *In Table 10, the LOS summary tabulated for the intersection of Hospital Road at Westerly Site Driveway/NE Studios Driveway is not consistent with the Capacity Analysis worksheets for the evening peak hour under Existing and No-Build conditions. We ask the Applicant to clarify this discrepancy along with any effect it has on the outcome of the traffic operations.*

VHB Response: There were some numbers transposed in Table 10, which have been corrected and are provided in the Attachments.

Nitsch Engineering Comment #23: *Nitsch noted that the TIAS did not include a sight distance assessment. During Nitsch's site visit, we noted the sight distance of the recently constructed driveways to be impacted by encroaching vegetation and construction of the Hospital Road/Givry Street when looking left or right of both site driveway intersections. Nitsch requests the Applicant perform the following:*

- *Clarify if a sight distance assessment was conducted for the easterly and westerly site driveways to account for operations during construction, and request the Applicant provide a summary table with a comparison of the measured and recommended values using 85th percentile speeds based on American Association of State Highway Transportation Officials (AASHTO) standards;*
- *Generate a sight triangle diagram showing the sight lines for both the Westerly Site Driveway and Easterly Site Driveway based on the 85th percentile speed to establish the quantity and*

locations of the vegetation to be cleared to achieve the recommended intersection sight distance (ISD);

- *Confirm that signs, landscaping, and other features located within sight triangle areas shall be designed, installed, and maintained so as not to exceed 2.5 feet in height. Snow accumulation (windrows) located within sight triangle areas that exceed 3.5 feet in height or that would otherwise inhibit sight lines shall be promptly removed; and*
- *Confirm if any proposed vegetation clearing will be conducted on land controlled by the Applicant, and if additional land acquisition and/or coordination with the Town may be required.*

VHB Response: As stated in Response 1, a sight distance evaluation was conducted as part of the 2021 TIAS, which recommended trimming of overgrowth at the driveways. As such, a new sight distance evaluation was not conducted as part of the 2025 TIAS. However, given that the reconstruction of Hospital Road/Givry Street intersection was completed after the completion of the TIAS, new measurements will need to be taken in the Spring for the movements affected by the reconstruction. Signs and landscaping are not located within the sight triangle and the Applicant will commit to maintaining overgrowth and removing snow windows as needed. Plans showing the sight distance triangles will be provided when the new measurements are taken.

Nitsch Engineering Comment #24*: During Nitsch's site visit, Nitsch observed a tractor-trailer truck (WB-67) encroaching the new sidewalk curb while attempting to turn onto the easterly site driveway approach from the parking lot. We recommend the Applicant provide the following in regard to the Site Plan:*

- *Compared to current site operations, clarify how the Project expansion of CFS-3 and CFS-4 may alter the site driveway access and demand for delivery and emergency vehicles;*
- *Using AutoTurn or Vehicle Tracking, construct vehicle circulation diagrams for emergency and trash collection vehicles to ensure circulation throughout the site without impedance; and*
- *Perform additional truck turn movements at the reconfigured intersection of Hospital Road at Givry Street for the critical movements, and work with the Town to ensure a safe truck routing plan through the study area for the Project.*

VHB Response: The Project does not propose modifications to the existing site driveways.

Vehicle tracking plans illustrating Deven's fire truck maneuverability were/are included in the site plans and have been approved by Fire Chief Kelly.

Regarding the intersection of Hospital Road at Givry Street, vehicle tracking was evaluated for a WB-67 as part of the design review and is included in the Attachments.

Nitsch Engineering Comment #25*: The Transportation Demand Management (TDM) Program section states that the accompanying site plans outline where the designated preferential parking and hybrid/zero/low-emission vehicle parking will be located, but this information was omitted from the Site Plans. Nitsch recommends the Applicant clarify the location of the designated preferential parking and hybrid/zero/low-emission vehicle parking.*

VHB Response: There are currently 6 EV charging spaces located along the west side of the building and there are plans for an additional 30 EV spaces in the new garage.

Nitsch Engineering Comment #26*: During Nitsch's site visit, we observed the intersection of Hospital Road at Front Road and noted the stop bar was located 28 feet from the crosswalk, which is beyond the recommended placement, resulting in vehicles stopping beyond the stop bar to turn onto Front Road. We also observed a lack of school zone signage adjacent to the Ayer-Shirley Regional Middle School. We recommend the Applicant work with the Town to relocate the stop bar and provide additional school zone signage adjacent to the intersection of Hospital Road at Front Road*

VHB Response: VHB acknowledges the location of the existing stop bar and assumes that this is driven by the swept path for tractor trailers. If so, the stop bar should remain in its current location. VHB also acknowledges the lack of school zone signage. However, implementation of a school zone is not being driven by the Project and is outside of the scope of the Project.

Attachments

Grant Road at Pine Road

Grant Road generally runs in a north-south direction and is intersected by Pine Road from the east to form a three-legged unsignalized intersection. All approaches are under stop control and consist of one all-purpose lane. A sidewalk is provided along the west side of Grant Road at the south leg of the intersection. A southbound on-street bike lane is provided along the west side of Grant Road at the north and south legs of the intersection. Land around the intersection is residential or forested.

Intersection	
Int Delay, s/veh	89.6

Movement	SEL	SET	SER	NWL	NWT	NWR	NEL	NET	NER	SWL	SWT	SWR
Lane Configurations		↕			↕			↕			↕	
Traffic Vol, veh/h	17	4	512	9	11	8	181	361	0	1	398	20
Future Vol, veh/h	17	4	512	9	11	8	181	361	0	1	398	20
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	1	0	0	0
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	91	91	91	54	54	54	91	91	91	67	67	67
Heavy Vehicles, %	40	25	2	13	70	0	0	3	0	0	38	0
Mvmt Flow	19	4	563	17	20	15	199	397	0	1	594	30

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	1417	1407	609	1395	1422	398	624	0	0	398	0	0
Stage 1	612	612	-	796	796	-	-	-	-	-	-	-
Stage 2	805	796	-	599	627	-	-	-	-	-	-	-
Critical Hdwy	7.5	6.75	6.22	7.23	7.2	6.2	4.1	-	-	4.1	-	-
Critical Hdwy Stg 1	6.5	5.75	-	6.23	6.2	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.5	5.75	-	6.23	6.2	-	-	-	-	-	-	-
Follow-up Hdwy	3.86	4.225	3.318	3.617	4.63	3.3	2.2	-	-	2.2	-	-
Pot Cap-1 Maneuver	95	124	~ 495	112	99	656	967	-	-	1172	-	-
Stage 1	421	449	-	365	316	-	-	-	-	-	-	-
Stage 2	326	368	-	470	385	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	53	91	~ 495	-	72	656	967	-	-	1171	-	-
Mov Cap-2 Maneuver	53	91	-	-	72	-	-	-	-	-	-	-
Stage 1	420	449	-	268	232	-	-	-	-	-	-	-
Stage 2	214	271	-	-	384	-	-	-	-	-	-	-

Approach	SE	NW	NE	SW
HCM Ctrl Dly, s/v	281.1		3.23	0.02
HCM LOS	F	-		

Minor Lane/Major Mvmt	NEL	NET	NER	NWLn1	SELn1	SWL	SWT	SWR
Capacity (veh/h)	601	-	-	-	381	4	-	-
HCM Lane V/C Ratio	0.206	-	-	-	1.538	0.001	-	-
HCM Ctrl Dly (s/v)	9.7	0	-	-	281.1	8.1	0	-
HCM Lane LOS	A	A	-	-	F	A	A	-
HCM 95th %tile Q(veh)	0.8	-	-	-	32.4	0	-	-

Notes	
~: Volume exceeds capacity	$: Delay exceeds 300s
+: Computation Not Defined	*: All major volume in platoon

Intersection	
Int Delay, s/veh	170.6

Movement	SEL	SET	SER	NWL	NWT	NWR	NEL	NET	NER	SWL	SWT	SWR
Lane Configurations		↕			↕			↕			↕	
Traffic Vol, veh/h	19	5	597	10	13	9	210	506	0	1	593	23
Future Vol, veh/h	19	5	597	10	13	9	210	506	0	1	593	23
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	1	0	0	0
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	92	92	92	92	92	92	92	92	92	92	92	92
Heavy Vehicles, %	40	25	2	13	70	0	0	3	0	0	38	0
Mvmt Flow	21	5	649	11	14	10	228	550	0	1	645	25

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	1678	1667	658	1994	1679	551	670	0	0	551	0	0
Stage 1	660	660	-	1007	1007	-	-	-	-	-	-	-
Stage 2	1018	1007	-	987	672	-	-	-	-	-	-	-
Critical Hdwy	7.5	6.75	6.22	7.23	7.2	6.2	4.1	-	-	4.1	-	-
Critical Hdwy Stg 1	6.5	5.75	-	6.23	6.2	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.5	5.75	-	6.23	6.2	-	-	-	-	-	-	-
Follow-up Hdwy	3.86	4.225	3.318	3.617	4.63	3.3	2.2	-	-	2.2	-	-
Pot Cap-1 Maneuver	61	85	~ 464	42	66	538	930	-	-	1029	-	-
Stage 1	395	427	-	277	245	-	-	-	-	-	-	-
Stage 2	244	291	-	284	365	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	33	55	~ 464	-	43	538	930	-	-	1028	-	-
Mov Cap-2 Maneuver	33	55	-	-	43	-	-	-	-	-	-	-
Stage 1	256	426	-	179	158	-	-	-	-	-	-	-
Stage 2	141	188	-	-	364	-	-	-	-	-	-	-

Approach	SE	NW	NE	SW
HCM Ctrl Dly, s/v	$ 542.1		3	0
HCM LOS	F	-		

Minor Lane/Major Mvmt	NEL	NET	NER	NWLn1	SELn1	SWL	SWT	SWR
Capacity (veh/h)	930	-	-	-	318	1028	-	-
HCM Lane V/C Ratio	0.245	-	-	-	2.123	0.001	-	-
HCM Ctrl Dly (s/v)	10.1	0	-	-	-$ 542.1	8.5	0	-
HCM Lane LOS	B	A	-	-	F	A	A	-
HCM 95th %tile Q (veh)	1	-	-	-	49.7	0	-	-

Notes	
~: Volume exceeds capacity	$: Delay exceeds 300s
+: Computation Not Defined	*: All major volume in platoon

Intersection	
Int Delay, s/veh	35.3

Movement	SEL	SET	SER	NWL	NWT	NWR	NEL	NET	NER	SWL	SWT	SWR
Lane Configurations		↕			↕			↕			↕	
Traffic Vol, veh/h	19	5	617	10	13	9	221	506	0	1	153	23
Future Vol, veh/h	19	5	617	10	13	9	221	506	0	1	153	23
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	1	0	0	0
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	92	92	92	92	92	92	92	92	92	92	92	92
Heavy Vehicles, %	40	25	2	13	70	0	0	3	0	0	38	0
Mvmt Flow	21	5	671	11	14	10	240	550	0	1	166	25

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	1223	1212	179	1550	1224	551	191	0	0	551	0	0
Stage 1	181	181	-	1031	1031	-	-	-	-	-	-	-
Stage 2	1042	1031	-	519	193	-	-	-	-	-	-	-
Critical Hdwy	7.5	6.75	6.22	7.23	7.2	6.2	4.1	-	-	4.1	-	-
Critical Hdwy Stg 1	6.5	5.75	-	6.23	6.2	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.5	5.75	-	6.23	6.2	-	-	-	-	-	-	-
Follow-up Hdwy	3.86	4.225	3.318	3.617	4.63	3.3	2.2	-	-	2.2	-	-
Pot Cap-1 Maneuver	131	165	864	87	133	538	1395	-	-	1029	-	-
Stage 1	740	708	-	268	238	-	-	-	-	-	-	-
Stage 2	236	283	-	520	630	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	93	124	864	15	100	538	1395	-	-	1028	-	-
Mov Cap-2 Maneuver	93	124	-	15	100	-	-	-	-	-	-	-
Stage 1	556	707	-	201	179	-	-	-	-	-	-	-
Stage 2	160	213	-	115	629	-	-	-	-	-	-	-

Approach	SE	NW	NE	SW
HCM Ctrl Dly, s/v	70.8	267	2.5	0
HCM LOS	F	F		

Minor Lane/Major Mvmt	NEL	NET	NER	NWLn1	SELn1	SWL	SWT	SWR
Capacity (veh/h)	1395	-	-	39	669	1028	-	-
HCM Lane V/C Ratio	0.172	-	-	0.892	1.041	0.001	-	-
HCM Ctrl Dly (s/v)	8.1	0	-	267	70.8	8.5	0	-
HCM Lane LOS	A	A	-	F	F	A	A	-
HCM 95th %tile Q (veh)	0.6	-	-	3.4	18	0	-	-

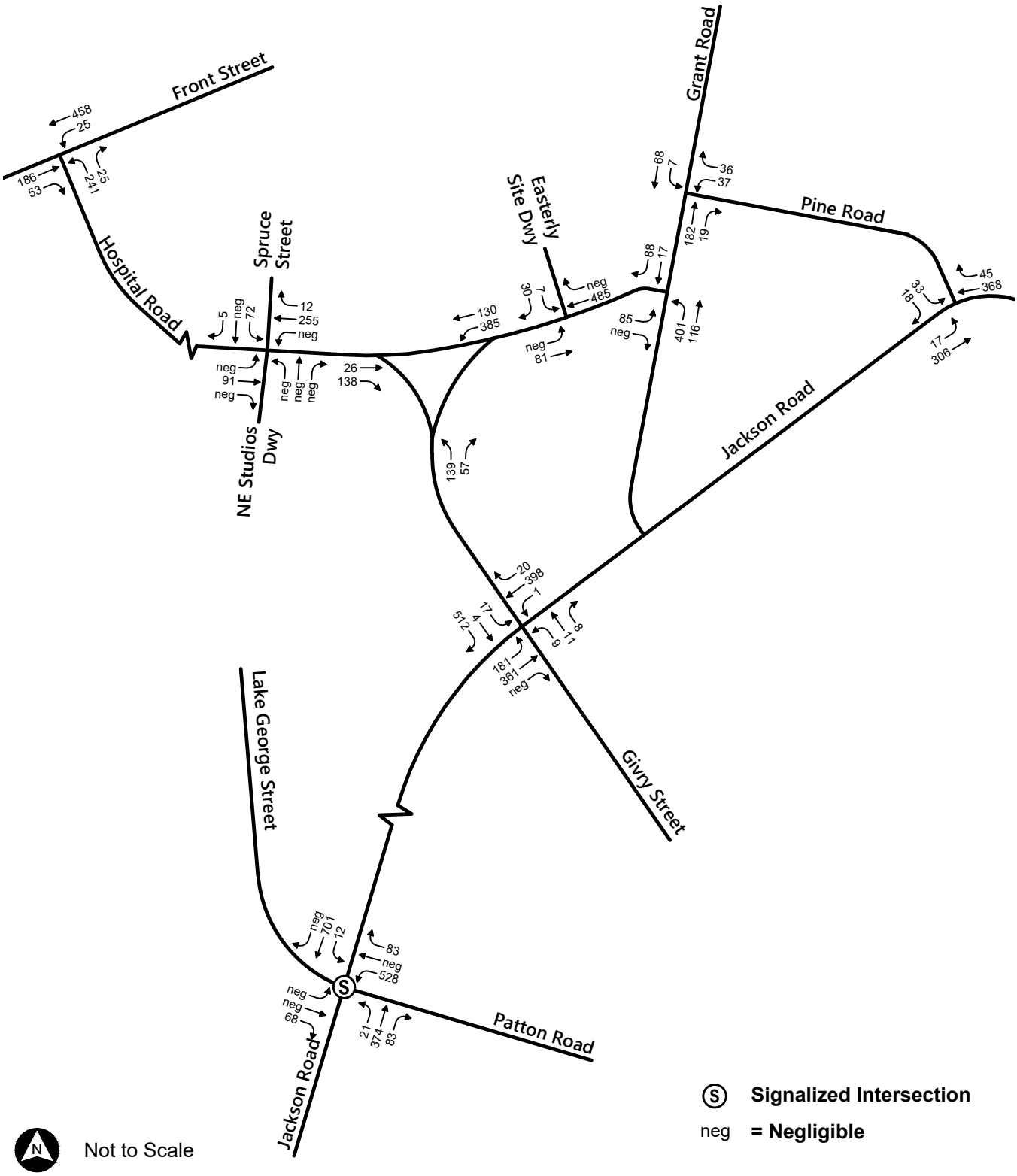
Unsignalized Intersection Capacity Analysis

Location / Movement	2025 Existing Conditions					2032 No-Build Conditions					2032 Build Conditions				
	D [a]	v/c [b]	Del [c]	LOS [d]	95 Q [e]	D	v/c	Del	LOS	95 Q	D	v/c	Del	LOS	95 Q
Jackson Road at Givry Street															
Weekday Morning															
NEB L	123	0.13	9	A	10	149	0.18	10	A	15	168	0.20	10	A	18
SWB L	2	0.00	9	A	0	3	0.00	10	A	0	3	0.00	10	A	0
NWB L/T/R	1	0.01	13	B	0	1	0.00	16	C	0	1	0.00	16	C	0
SEB L/T/R	115	0.52	31	D	70	135	0.97	>120	F	178	141	1.07	>120	F	205
Weekday Evening															
NEB L	181	0.21	10	A	20	210	0.25	10	B	25	221	0.17	8	A	15
SWB L	1	0.00	8	A	0	1	0.00	9	A	0	1	0.00	9	A	0
NWB L/T/R	-	-	-	-	-	-	-	-	-	-	32	0.89	>120	F	85
SEB L/T/R	533	>1.20	>120	F	810	621	>1.20	>120	F	1243	641	1.04	71	F	450

a Demand
b Volume to capacity ratio.
c Average total delay, in seconds per vehicle.
d Level-of-service.
e 95th percentile queue, in feet.
f Yield-controlled movement modeled as a stop-controlled movement in Synchro to obtain results.

Figure 4: 2025 Existing Conditions Weekday Evening Peak Hour Vehicle Volumes

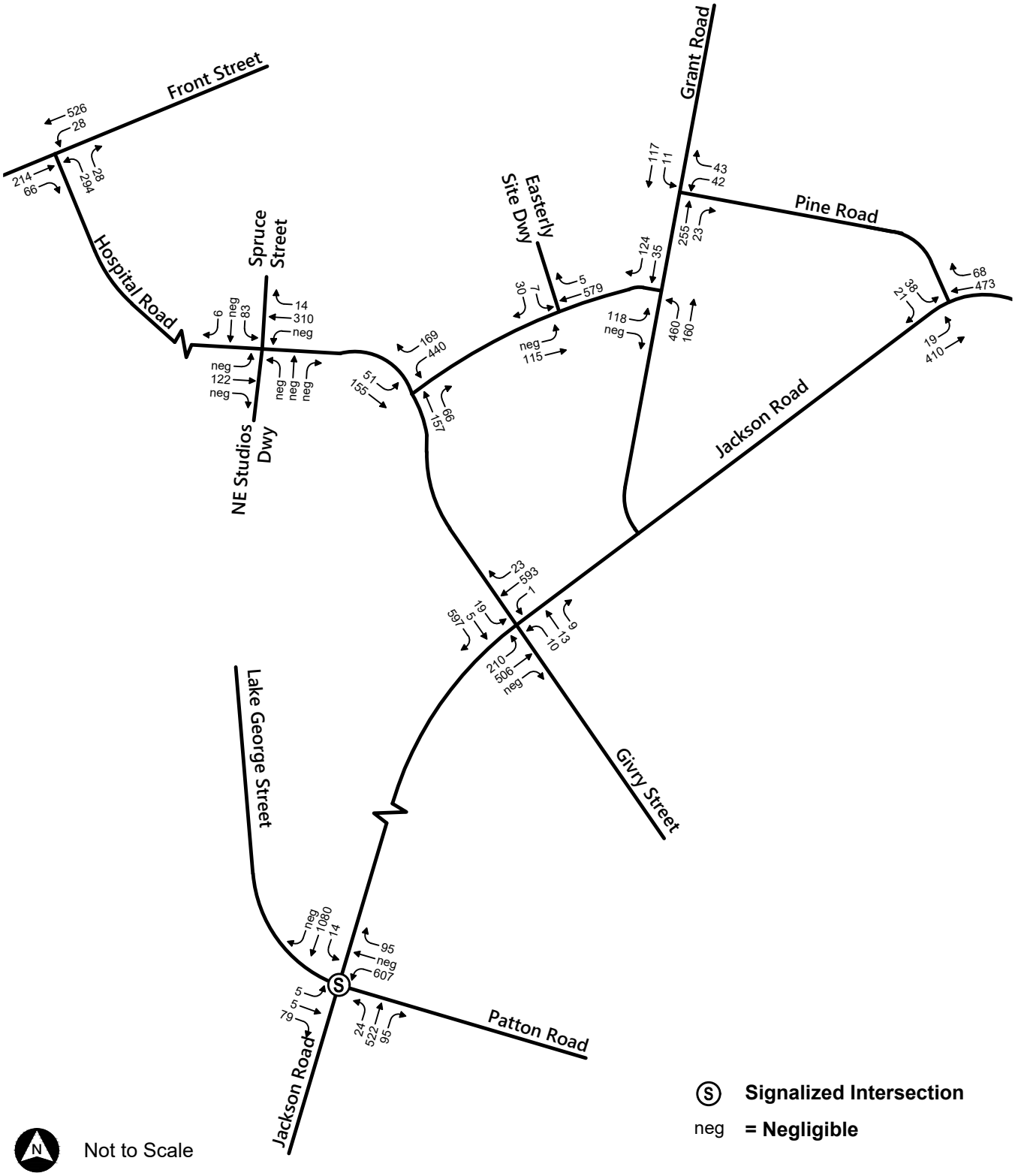
CFS Buildings 3&4 | Devens, MA



\\vhb.com\gbl\proj\Wat-LD\14867.01\Graphics\FIGURES\Traffic\CFS 4\Network Diagrams - CFS 4.dwg

Figure 6: 2032 No-Build Conditions Weekday Evening Peak Hour Traffic Volumes

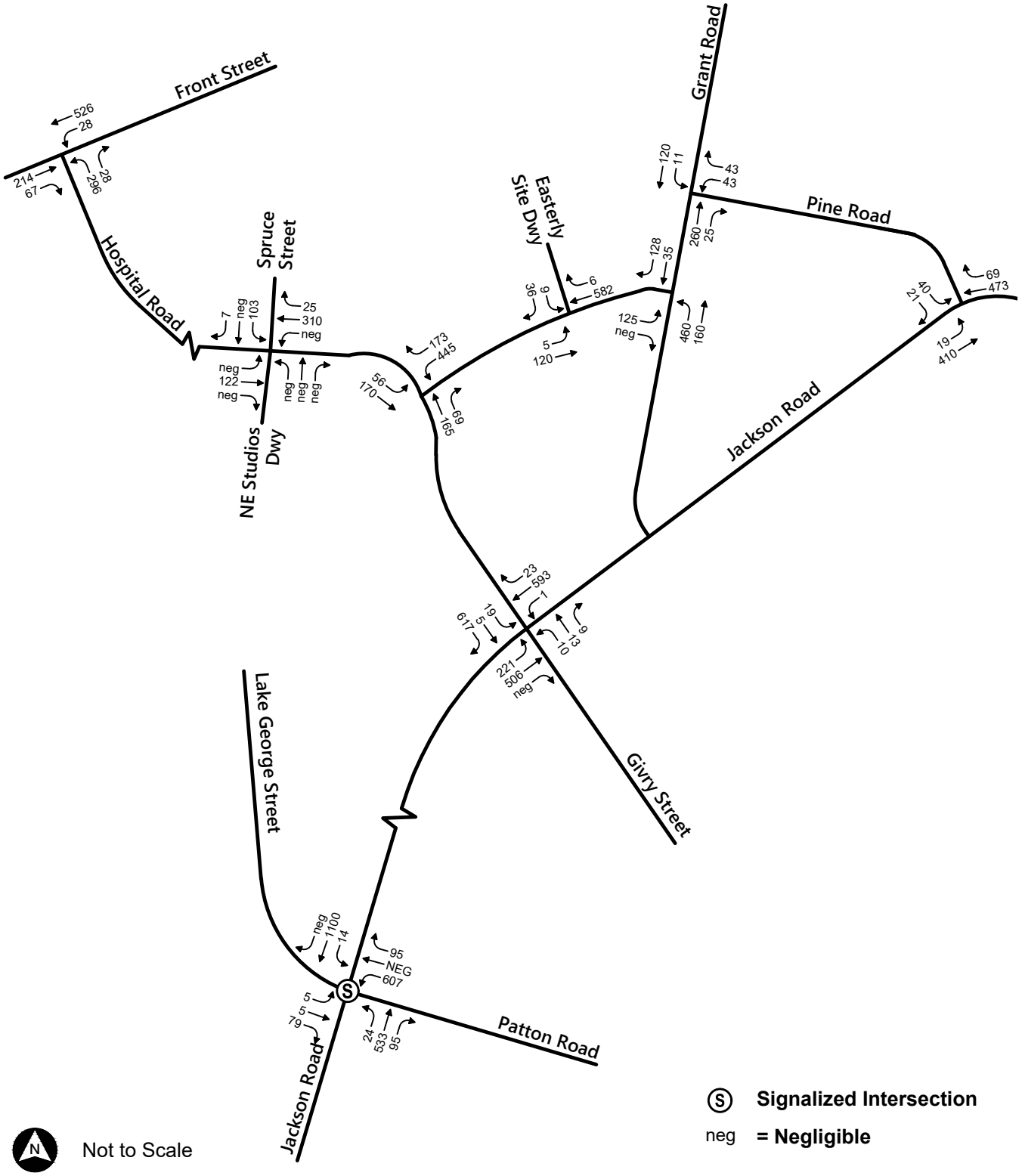
CFS Buildings 3&4 | Devens, MA



\\vhb.com\gbl\proj\Wat-LD\14867.01\Graphics\FIGURES\Traffic\CFS 4\Network Diagrams - CFS 4.dwg

Figure 9: 2032 Build Conditions Weekday Evening Peak Hour Traffic Volumes

CFS Buildings 3&4 | Devens, MA



June 8, 2023

Certified Mail 7020 1810 0000 2012 7687

MACK Devens Development 11 LLC
(SMC Limited)
18 Independences Drive
Devens Ma. 01434

Re: MACK Devens Development 11 LLC., Devens, MA Unified Permit Approval

Dear Mr.Fluet,

Please find enclosed the original signed Unified Permit Record of Decision (ROD) for the construction of a +/-232,320 sq.ft. new industrial building, with associated grading, landscaping, parking, stormwater, and utility improvements. Property located at 11 Grant Road, Devens (Harvard), MA. This approval was granted by the Devens Enterprise Commission (DEC) at its June 8, 2023 meeting.

Please ensure the ROD is recorded in the Worcester County Registry and notify the DEC office of the Volume and Page number once the ROD has been recorded. Please also note, there is a 30-day appeal period (from the date of the Decision) that expires on July 8, 2023. No construction activity is authorized until the appeal period ends and the applicable conditions of approval in the Record of Decision have been addressed.

Feel free to contact me with any questions.

Sincerely,

Neil Angus, FAICP CEP, LEED AP, LFA
Environmental Planner

cc: Ayer Town Clerk (certified)
Harvard Town Clerk (certified)
Shirley Town Clerk (certified)
Meg Delorier, EVP Devens
Tania Hartford, EVP Real Estate, MassDevelopment
Patrick McCarty, McCarty Engineering

Record of Decision
MACK DEVENS DEVELOPMENT 11, LLC.
11 Grant Road (Parcel ID#0.19.0-0008-0400.0)
Devens (Harvard), MA
June 8, 2023

1. **Owner/Applicant:**
The landowner is MassDevelopment Finance Agency, 99 High Street, 11th Floor, Boston, MA 02110. The Applicant is Mack Devens Development 11, LLC., 18 Independence Drive, Devens, MA 01434.

2. **Premises and Proposed Project:**
The applicant is seeking a Level 2 Unified Permit for site plan approval for the proposed development of a new 232,320 gross square foot industrial building and associated site improvements, including parking, stormwater management, landscaping, and utility infrastructure on a 13.2 acre parcel previously developed parcel of land at 11 Grant Road (Parcel ID#0.19.0-0008-0400.0), in Devens (Harvard), MA (Deed Reference: Bk: 26317 Pg. 003) in the Innovation, Technology and Business District, Open Space and Recreation Zone, and Watershed WRP Overlay District.

3. **Submission:**
The application includes the following, which all become part of the record:

   1. Level 2 Unified permit Application package including the following:
      - Cover Letter from Brian Marchetti, PE and John Murphy, Engineer Planner, dated March 2, 2023 (2 pages)
      - DEC Completed Level 2 Unified Permit Application Form (#D23-011) submitted March 2, 2023
      - Narrative
      - DEC Completed Level 2 Unified Permit Application Checklist for Determination of Completeness
      - Permit Fee Check
      - Industrial Performance Standards Checklist for Newly Proposed Projects
      - Traffic Impact and Access Study
      - LEED Checklist for Sustainable Sites
      - Geotechnical Study Reports
      - Community Noise Evaluation Study
      - Stormwater Management Report
   2. Site Plans Entitled: "Proposed Industrial Building 11 Grant Road, Devens, Massachusetts 01434", prepared by McCarty Engineering, Inc.; dated March 2, 2023, including the following sheets:
      - Cover Sheet
      - 1 – Existing Conditions Plan
      - 2 – Overall Site Plan
      - 3 – Demolition and Erosion Control Plan
      - 4 – Erosion Control Notes
      - 5-6 – Layout and Materials Plan
      - 7-8 – Grading and Drainage Plan
      - 9-10– Utility Plan
      - 11-12 – Landscape Plan
      - 13 - Landscape Maintenance Plan
      - 14-15 – Lighting Plan
      - 16 – Truck Turning Plan
      - 17-20 – Construction Details
      - 21-22 – Stormtech Detail Sheet

- A-201 – Overall Main Level Floor Plan
- A-301 – Exterior Elevations

3. Public Hearing Notice to abutters and interested parties (including certified mail return receipts) dated March 6, 2023;
4. Public Hearing legal notice publication memo to Nashoba Publications, dated March 6, 2023 (publication dates April 7, 2023 and April 14, 2023);
5. Public Hearing Notice to Board of Selectman and Planning Boards, Towns of Ayer, Harvard and Shirley, dated March 6, 2023 (received March 13, 2023) from Peter Lowitt, Director DEC;
6. Public Hearing Notice to Town Clerks of Ayer, Harvard, Shirley, Lancaster, MassDevelopment, dated March 6, 2023, from Peter Lowitt/Dawn Babcock.
7. Community Cable Advisory Committee notice, dated March 6, 2023, to run March 11 through April 25, 2023;
8. Public Hearing Notice to the Secretary of State, dated March 6, 2023.
9. Determination of Completeness, dated March 9, 2023, signed by Peter Lowitt.
10. Plan Circulation memo dated March 9, 2023, from Neil Angus to MassDevelopment Re: Level 2 Unified Permit – 11 Grant Road (1 Page);
11. Community Noise Evaluation; Werfen Devens Facility memo prepared by Acentech for McCarty Companies, dated March 10, 2023 (10 pages);
12. Peer Review Noise Evaluation memo prepared by Tech Environmental for Devens Enterprise Commission, dated March 17, 2023 (3pages);
13. Response to Comments Traffic Impact and Access Study Appropriateness Memo from McCarty Engineering, Inc. to Devens Enterprise Commission, Dated March 23, 2023 (4 pages);
14. Landscape Plan Peer Review comments from James Kros, IBI Group, to Neil Angus, dated March 23, 2023 (3 pages);
15. Peer Review Engineering comments from Paige Blanchard and Jennifer Johnson, Nitsch Engineering, to Neil Angus, dated March 23, 2023 (7 pages);
16. DEC and MassDevelopment Review Comments from Neil Angus to Mack Devens Development 11, LLC. and McCarty Engineering, Inc., dated March 30, 2023 (5 pages);
17. Peer Review Noise Evaluation memo from Tech Environmental to Devens Enterprise Commission, dated March 30, 2023 (3 pages);
18. Peer Review Engineering comments (Traffic) from Adina Alpert and John Michalak, Nitsch Engineering, to Neil Angus, dated March 31, 2023 (7 pages);
19. Level 2 Unified Permit Application Response to Comments submitted to Devens Enterprise Commission by Mack Devens development 11, LLC., 11 Grant Road, Devens Massachusetts and McCarty Engineering, Inc., dated April 14, 2023 (74 pages);
20. Revised Site Plans Entitled: "Level 2 Unified Permit Application Documents Proposed Industrial Building, 11 Grant Road, Devens Massachusetts 01434", prepared by McCarty Engineering, Inc.; dated March 2, 2023 (Revised April 14, 2023), including the following sheets:
    - Cover Sheet
    - 1-2 – Existing Conditions Plan
    - 3 – Erosion Control Notes
    - 4 – Overall Site Plan
    - 5 – Demolition and Erosion Control Plan

- 6-7 – Layout and Materials Plan
- 8-9 – Grading and Drainage Plan
- 10-11– Utility Plan
- 12-13 – Landscape Plan
- 14 - Landscape Maintenance Plan
- 15-16 – Lighting Plan
- 17 –Truck Turning Plan
- 18 – Fire Truck Turning Plan
- 19 – Parking Lot Phasing Plan
- 20-23 – Construction Details
- 24-25 – Stormtech Detail Sheet
- A-201 – Overall Main Level Floor Plan
- A-301 – Exterior Elevations

21. Devens Enterprise Commission Staff Report, Dated April 24, 2023 (6 pages);
22. Peer Review Engineering comments from Paige Blanchard and Jennifer Johnson, Nitsch Engineering, to Neil Angus, dated April 28, 2023 (13 pages);
23. Community Noise Evaluation; Werfen Devens Facility memo prepared by Acentech for McCarty Companies, dated May 2, 2023 (29 pages);
24. Request and Acceptance of 75-Day decision period extension request from Patrick McCarty, dated May 3, 2023 (continue to May 30, 2023);
25. Landscape Peer Review Comments prepared by IBI Group for Devens Enterprise Commission, dated May 3, 2023 (7 pages);
26. Response to Transportation Peer Review Comments prepared by Green International Affiliates, Inc. for Devens Enterprise Commission, dated May 16, 2023 (261 pages);
27. Cadna Modeling Results v11 Table by Acentech, Dated May 18, 2023;
28. Devens Enterprise Commission Staff Report, Dated May 26, 2023 (3 pages);
29. Mullin Rule Affidavit, dated May 26, 2023, from Commissioner Gardner re: April 25, 2023 public hearing;
30. Mullin Rule Affidavit, dated May 30, 2023, from Commissioner Lilly re: May 4, 2023 public hearing;
31. Response to Landscape Comments, prepared by McCarty Engineering, Inc. to Devens Enterprise Commission, dated May 30, 2023 (8 pages);
32. Revised Site Plans Entitled: "Level 2 Unified Permit Application Documents Proposed Industrial Building, 11 Grant Road, Devens Massachusetts 01434", prepared by McCarty Engineering, Inc.; dated March 2, 2023 (Revised May 30, 2023), including the following sheets:
    - Cover Sheet
    - 1-2 – Existing Conditions Plan
    - 3 – Erosion Control Notes
    - 4 – Overall Site Plan
    - 5 – Demolition and Erosion Control Plan
    - 6-7 – Layout and Materials Plan
    - 8-9 – Grading and Drainage Plan
    - 10-11– Utility Plan
    - 12-13 – Landscape Plan
    - 14 - Landscape Maintenance Plan
    - 15-16 – Lighting Plan
    - 17 –Truck Turning Plan
    - 18 – Fire Truck Turning Plan
    - 19 – Parking Lot Phasing Plan
    - 20-23 – Construction Details
    - 24-25 – Stormtech Detail Sheet
    - A-201 – Overall Main Level Floor Plan

- A-301 – Exterior Elevations

33. Request and Acceptance of 75-Day decision period extension request from Patrick McCarty, dated May 30, 2023 (continue to June 8, 2023);
34. Community Noise Evaluation; Werfen Devens Facility memo prepared by Acentech for McCarty Companies, dated May 31, 2023 (32 pages);
35. Mullin Rule Affidavit, dated June 2, 2023, from Commissioner Fetterhoff re: May 30, 2023 public hearing;
36. MassDevelopment Design Review Comments to Devens Enterprise Commission, dated June 5, 2023 (1 page);
37. Draft Record of Decision, distributed June 6, 2023 (7 pages);
38. Landscape Plan Peer Review comments (3rd round) from James Kos, Arcadis/IBI Group, to Neil Angus, dated June 6, 2023 (11 pages);
39. Devens Enterprise Commission Staff Report, Dated June 7, 2023 (1 page);
40. Email correspondence as follows:

To:	From:	Date:	Subject:
Neil Angus	Patrick McCarty	3/9/23	RE: DOC for 11 Grant
Patrick McCarty	Neil Angus	3/10/23	RE: DOC for 11 Grant
Mark Cohen	Neil Angus	3/17/23	RE: 11 Grant Road
Neil Angus	Patrick McCarty	3/17/23	RE: 11 Grant Road Study
Beth Suedmeyer	MassDevelopment Staff	3/23/23	RE: MassDevelopment Comments for 11 Grant Road
Chief Tim Kelly	Beth Suedmeyer	3/27/23	RE: MassDevelopment Comments for 11 Grant Road
Neil Angus	Patrick McCarty	3/30/23	RE: 11 Grant Road
Neil Angus	MassDevelopment Staff	4/7/23	RE: DOC for 11 Grant
Neil Angus	MassDevelopment Staff	4/19/23	RE: 11 Grant Road Revised Plans
Chief Tim Kelly	Neil Angus	4/20/23	RE: 11 Grant Road Revised Plans
Neil Angus	MassDevelopment Staff	4/20/23	RE: Response to Comments and Questions
Mark Cohen	Neil Angus	4/20/23	RE: 11 Grant Road Revised Plans
Joe Bisceglia	Beth Suedmeyer	4/23/23	RE: MassDevelopment Comments for 11 Grant Road
Erikk Hokenson	Beth Suedmeyer	4/23/23	RE: MassDevelopment Comments for 11 Grant Road
Neil Angus	Patrick McCarty, Alan Fluet, John Murphy	4/24/23	RE: 11 Grant DEC Public Hearing
James Kros	Neil Angus	4/25/23	RE: 11 Grant Road Response to Comments IBI Group Responses
Neil Angus	Nitsch Staff	4/27/23	RE Givry Drainage
Neil Angus	Michael Bahtiarian	5/1/23	RE: 11 Grant Road Sound Study - Request for Cadna Model
Patrick McCarty	Neil Angus	5/1/23	RE: 11 Grant Road Sound Study - Request for Cadna Model
Neil Angus	Tech Environmental Staff	5/2/23	RE: 11 Grant Updated Noise Evaluation
Neil Angus	Robert Jenkins	5/2/23	RE: 11 Grant Road Facades
Matthew Riegert	Neil Angus	5/3/23	RE: 11 Grant Updated Noise Evaluation
Neil Angus	Patrick McCarty	5/3/23	RE: 11 Grant Updated Noise Evaluation
James Kros	Neil Angus	5/4/23	RE: 11 Grant Road Response to Comments for IBI Group Second Review
Alan Fluet	Neil Angus	5/11/23	RE: 11 Grant concepts
Neil Angus	Alan Fluet	5/13/23	RE: 11 Grant concepts
Neil Angus	Nitsch Staff	5/16/23	RE: 11 Grant Road
Matthew Riegert	Neil Angus	5/17/23	RE: 11 Grant Road – Summary of Cadna/A Model Inputs
Neil Angus	Michael Bahtiarian	5/17/23	RE: 11 Grant Road – Summary of Cadna/A Model Inputs with DEC Inputs

Cont.			
To:	**From:**	**Date:**	**Subject:**
Michael Bahtiarian	Neil Angus	5/19/23	RE: 11 Grant Road – Updated Cadna/A Model Inputs with DEC Inputs
Neil Angus	Michael Bahtiarian	5/23/23	RE: 11 Grant Road Follow-up meeting
Neil Angus	Matthew Riegert	5/23/23	RE: 11 Grant Road and Truck Traffic and Sound Coordination
Neil Angus	Patrick McCarty	5/25/23	RE: 11 Grant Road Project Status Update
Patrick McCarty	Neil Angus	5/30/23	RE: Mack Devens – 11 Grant
Neil Angus	Marc Wallace	5/31/23	RE: 11 Grant Road Progress Report
Neil Angus	MassDevelopment Staff	5/31/23	RE: 11 Grant Road Updated Plans
Neil Angus	Tech Environmental	5/31/23	RE: 11 Grant Sound Study
Neil Angus	James Kros and Adina Alpert	5/31/23	RE: 11 Grant Road Updated Plans
Alan Fluet	Neil Angus	6/7/23	RE: Truck Traffic
Neil Angus	Patrick McCarty	6/7/23	RE: Truck Traffic [Staff Report and outstanding comments]

4. **Unified Permit Components and Actions:**
The Unified Permit for this project includes site plan approval for the proposed development of a new 232,320 gross square foot industrial building and associated site improvements, including parking, stormwater management, landscaping, and utility infrastructure on a 13.2 acre parcel previously developed parcel of land located at 11 Grant Road in Devens (Harvard), MA.

5. **Process:**
Mack Devens Development 11, LLC, submitted a Level II Unified Permit application package on March 2, 2023. The pre-permitting conference was completed on February 9, 2023, and the Determination of Completeness was issued on March 9, 2023. Copies of the application and plans were received by the surrounding Towns on March 13, 2023. Legal notices were placed in Nashoba Publications on April 7 and 14, 2023. Certified Mail notice was sent to all abutting property owners on March 9, 2023. The 30-day public comment period expired on April 12, 2023. No public comments were received. The public hearing opened on April 25, 2023 and was continued to May 4, 2023. The public hearing was again continued to May 30, 2023 after the Applicant requested, and the Commission granted, an extension of the 75-day review period from May 23, 2023 to May 30, 2023. The public hearing re-opened on May 30, 2023 and was continued again to the June 8, 2023 meeting after another extension of the 75-day review period was requested by the Applicant and granted by the Commission. The hearing re-opened on June 8, 2023, and closed that same day.

6. **Waivers:**
The Applicant requested the following waivers as part of this application.

974 CMR 3.04(3)(a)1.a. – Parking allowed in front of the building limited to 10% of the required parking spaces.
The property fronts on 3 streets so it is impossible to not locate any parking between the building façade and a public road. The proposed grading and landscaping has been

modified to screen the parking area from Jackson Road and portions of Givry and Grant Road.

974 CMR 3.02(3)(b)6.a. – "Scattered trees to be preserved shall also be shown as well as all specimen trees (trees exceeding a minimum caliper of 12" within 100 feet of existing and proposed lot lines) have been identified and indicated on the plan."
The plans have been updated to clearly show the limits of disturbance and existing specimen trees within the parcel boundaries. No trees will be impacted outside of the proposed limits of work and additional tree protection fencing has been added.

The Commission voted 7 to 1 to XX to grant both waiver requests, subject to the conditions of approval in Section 8. of this Unified Permit.

7. Findings:

The DEC finds that:

1. The proposed use involves diagnostics and quality control equipment manufacturing, research and development (light industrial) used in the medical device manufacturing field. Such uses are allowed in the Innovation and Technology Business District as per Exhibit D of the Devens Bylaws.
2. The unique nature of the facility operations for the proposed tenant (Werfen), operating a single shift 5-days a week, necessitates the use of 13 loading docks with approximately 12 trucks per day. Any change in use or extension of operating hours would require an updated traffic and noise study prior to approval.
3. The project is located within a Watershed Water Resources Protection District. The final plans, with the conditions listed herein, comply with the Stormwater Management Provisions and Water Resource Protection District Regulations in 974 CMR 4.08 to protect the ground and surface water resources through the implementation of best management practices during construction as well as long-term.
4. The on-site Storm Water Management system has been designed so that there are no untreated discharges from the site– all runoff will be pretreated through an on-site treatment train that includes on-site infiltration, and mechanical filtration. Discharges from the site, with conditions, have been designed to meet the MA DEP SWM Standards and DEC regulations and comply with the US EPA MS4 requirements. Any discharge to the Devens Municipal Stormwater System is under the jurisdiction of and subject to the review and approval of the Devens Engineering Department.
5. Regarding the approval criteria listed in 974 CMR 3.03(2):
   (a) The Site Plan, with conditions, complies with 974 CMR 3.00 and with the applicable provisions of the By-Laws.
   (b) The development lies on a lot that will be recorded at the Registry of Deeds.
   (c) The application is Complete.
   (d) All access is designed to provide for safe vehicular and pedestrian travel.
   (e) Access and circulation enables prompt fire, police, and emergency response.
   (f) Adequate capture and discharge of stormwater and surface water runoff and compliance with applicable portions of the "Devens Stormwater Pollution Prevention Plan" has been achieved.

(g) Connections with Devens utility, power and communication systems exist and new connections will be approved by MassDevelopment.
(h) Facilities required under the Water Resources Protection Bylaw and the related Design Standards will be included as per the conditions of approval.
(i) The plans comply with Landscaping Design Standards through the preservation of existing specimen trees and wooded areas to the maximum extent feasible, with conditions. The addition of living walls, comprised of vines on paired 6-foot wide trellises, in addition to the standard plantings, will help reduce the mass and scale of the building and assist with screening.
(j) A wetlands order of conditions is not applicable to this project.
(k) Industrial Performance Standards will be adhered to as per the final plans and conditions of approval.
(l) The proposed use provides sufficient parking for the intended use;
(m) The project will not interfere with existing traffic patterns;
(n) The applicant will participate in the Devens Transportation Management Initiative.
(o) Adequate water supply exists in terms of quantity, quality, and water pressure for domestic needs and fire protection.
(p) Connection to sanitary sewers will be made for this project.
(q) The building design, with conditions, will meet the minimum standards as established by Mass Development for the district in which the lot is located.
(r) Soil testing indicates that the soils are capable of supporting the proposed development.
(s) The development, with conditions, has been designed with due consideration for public health.
(t) Adequate climate change mitigation, adaptation and greenhouse gas emission mitigation measures have been conditioned and incorporated in accordance with 974 CMR 4.11.

8. Conditions:

The DEC voted to impose the following conditions:

1) Wherever "Applicant" is referenced in the Conditions set forth herein, it refers to the Applicant, its successors and assigns. Wherever "DEC" or "Commission" is referenced, it shall refer to the Devens Enterprise Commission, its successors and assigns.

2) In accordance with the Devens By-Laws, Article III, Section K 1. a., no soil, loam, sand, gravel, or other earth materials shall be permanently removed from any lot within Devens, except in accordance with the Devens Soil Management Policy and approval from the DEC.

3) Prior to commencing any intrusive earth work within Devens (due diligence, construction of otherwise) all personnel to be on site shall view an Unexploded Ordinance/Munitions of Explosive Concern (UXO/MEC) video briefing provided by the Devens Fire Department.

4) Once the appeal period has expired, the Applicant shall submit final approved plans to the DEC for endorsement. The Applicant shall file the endorsed plans, along with

the Record of Decision, with the Registry of Deeds and proof of recordation shall be submitted to the DEC prior to the issuance of a building permit. Plans shall conform to Worcester Registry recording requirements.

5) The Applicant and Owner shall file a Level One Lotting Plan Application with the DEC in order to create the lot. Once endorsed, this plan shall be recorded with the Registry. Proof of recording shall be provided to the DEC prior to commencement of construction. The final approved parcel boundaries shall then be added to the plan set prior to endorsement.

6) Prior to commencement of construction, the Applicant shall submit a copy of all applicable federal, state, and local permits necessary for the construction and operation of the facility must be obtained, including, but not limited to, their Construction Stormwater Pollution Prevention Plan (SWPPP), EPA Construction General Permit, and Driveway curb cut permits from MD/Devens Public Works. Copies of permits issued by those other than the DEC must also be filed with the DEC prior to commencement of any construction.

7) There is no approval of signs implicitly or explicitly granted in this Unified Permit and any erection of signs of any type will require subsequent DEC approval.

8) The Applicant shall provide As-Built Plans and accompanying information for all site improvements in accordance with the DEC As Built Policy, prior to issuance of a final Certificate of Occupancy.

9) The Applicant shall join the Devens Eco-Efficiency Center and demonstrate compliance with EcoStar Standard 24 – Climate Change Mitigation.

10) The Applicant shall file annual reports to the DEC in October of each year indicating how they are maintaining their on-site stormwater management facilities. This is an on-going condition once construction is completed.

11) Landscaping shall be maintained in good condition in accordance with the approved landscape plan and 974 CMR 3.04(m). The applicant is required to submit a letter confirming a one-year guarantee of all approved landscaping once installed. Any dead or damaged landscaping must be replaced promptly. An Irrigation system is not part of this approval. The Applicant is required to obtain administrative approval for any future proposed irrigation. Such system must comply with 974 CMR 4.08 and 8.09.

12) Prior to commencement of construction, limits of disturbance shall be flagged in the field and all necessary erosion controls and tree protection shall be inspected by DEC Staff. Additional controls shall be implemented at the discretion of the DEC or its Staff. A written report documenting compliance with the approved erosion and sedimentation controls shall be maintained by the developer and made available to the DEC for review upon request.

13) Jackson Gate from Route 2 shall be the primary means of truck access to and from the site on a permanent basis, with other gates to be used only in an emergency situations or during protracted construction when the Jackson gate is unavailable. The Applicant shall post signs that all trucks must enter and exit Devens via the Jackson Gate at Route 2 on the exit gate of the facility. The Applicant shall take appropriate measures

to encourage all automobile traffic associated with this project to use Jackson Gate to the maximum degree feasible. Trucks shall be prohibited from turning left out of the Grant Road driveway. A sign shall be placed at the Grant Road exit noting "no left turns" for trucks.

14) The reserve parking area shown on the plans is not part of this approval. Any parking lot expansion will require separate review and approval by the DEC.

15) Prior to issuance of a building permit, the Applicant shall submit a final design review approval letter from Mass Development for the project. The Project shall remain in compliance with the Jackson Technology Park Design Guidelines as may be amended (the "Design Guidelines") and/or waived. The Applicant shall adhere to any comments and conditions included in the design approval letter.

16) Werfen is an approved tenant. Any proposed future tenant will need to be reviewed and approved by the DEC and the Devens Public Safety Officer to ensure compliance with the Devens Bylaws and allowable uses in the Innovation and Technology Business District.

17) Prior to a Certificate of Occupancy, an updated Long-Term Operations and Maintenance Plan shall be provided that includes Long Term Pollution Prevention Plan and Stormwater Management Operations and Maintenance Plan notes on Sheet 14 of the plan set, and that addresses the requirements in:

    a. 974 CMR 3.04(8) (Landscape Maintenance Requirements)
    b. 974 CMR 4.08 (Stormwater Management & Devens Stormwater Pollution Prevention Plan)
    c. 974 CMR 4.09 (Water Resource Protection District & Devens Water Resources Protection Report)

18) To help reduce single occupancy vehicle use and greenhouse gas emissions from transportation, the Applicant shall join the Devens Transportation Management Association [TMA] and implement additional traffic mitigation measures. The Applicant shall install electric vehicle charging stations to cover a minimum of six (6) spaces, in addition to six dedicated carpool parking spaces and six hybrid/fuel efficient vehicle parking spaces.

19) The facility shall comply with the Massachusetts Anti-Idling law (5-minute restriction). The Applicant shall post signage at all loading docks and drop-off areas notifying drivers of this requirement. Shore power units shall be provided at all loading docks for refrigerated trailers, as well as auxiliary power units for truck cabs.

20) Due to the amount of earth work, prior to commencement of construction, a construction phasing plan shall be submitted to DEC for review and approval. Any on-site processing of materials shall be set back from Grant Road as far as possible to prevent noise and dust from impacting off-site properties. Due to the extent of earthwork, dust control shall be maintained at all times throughout construction. This includes, but is not limited to, watering trucks, temporary seeding, and any other DEC or MassDEP approved strategies.

21) The proposed multi-use trail and road widening, shown on Sheet 6 of the plan set along Jackson Road, shall be the responsibility of the Applicant and coordinated with the DEC and MassDevelopment. The Applicant is responsible for sidewalk

connections along Givry Street as well and shall coordinate the location and construction with the DEC and MassDevelopment.

22) Prior to issuance of a building permit, retaining wall and footing design specifications shall be provided. Such specifications shall include coordinated reviews with a geotechnical and structural engineer to ensure the proximity of the underground infiltration system and any associated hydrostatic pressure, are adequately factored into the wall design and construction.

23) Prior to DEC endorsement, the final plans shall be revised to include the following:

a) All remaining comments in the letter from Nitsch Engineering, RE: "Nitsch Project #9419 Site Plan and Stormwater Review, Devens, MA", dated April 28, 2023. Updated stormwater management plan shall be submitted that addresses these remaining comments as well.

b) Note to be included on lighting plan that requires all proposed lighting, including wall-mounted fixtures, must be no greater than 3000K and have recessed light sources no greater than 90 degrees from the building and properly shielded to prevent off-site glare to comply with 974 CMR 3.04 and 4.04.

c) All remaining landscaping comments in the peer review letter from James Kros, IBI Group, to Neil Angus, dated June 6, 2023. The applicant shall coordinate with the DEC and the landscape peer reviewer to ensure all appropriate slope stabilization measures are in place.

24) Prior to commencement of construction, the sound study shall be updated to address the additional supporting information required on the truck use and operations for the modelling, including use-specific data from the existing Werfen facility. This study shall be reviewed and approved by the DEC's sound consultants prior to issuance of a building permit. All required sound mitigation in the final approved sound study shall be installed prior to issuance of a Certificate of Occupancy.

25) To comply with the DEC Industrial Performance Standards for Noise, the operations are limited to weekday daytime hours only. Applicant shall schedule all truck deliveries to occur during the daytime hours (7AM-6PM weekdays). There will be no trucking operations overnight and on weekends and statutory holidays. This shall be included in the facility O&M Plan. Any change in operations beyond this will require an updated sound study to demonstrate compliance with 974 CMR 4.05.

26) A revised Traffic Report shall be submitted that addresses all response comments and original comments from Nitsch Engineering, as outline in the Memo from Green International Affiliates, Inc., to Neil Angus, Subject: Response to Transportation Peer Review Comments (Green Project No.21090), dated May 16, 2023.

27) All outstanding peer review fees shall be paid prior to issuance of a building permit.

28) Prior to final endorsement, the final plans shall be revised to reduce the building size by 5,530 square feet (pulling it back and additional 10 feet from Grant Road), for a total building size of 232,320 square feet. Associated site plan adjustments shall be made.

9. **Decision:**
The Public Hearing closed on June 8, 2023 and the DEC voted to grant the requested waivers, issue findings, including that the application complied with Approval Criteria in 974 CMR 3.03(2), to impose conditions, and to approve the Site Plan for the proposed development of a new 232,320 gross square foot industrial building and associated site improvements, including parking, stormwater management, landscaping, and utility infrastructure on a 13.2 acre parcel previously developed parcel of land located at 11 Grant Road in Devens (Harvard), MA.

10. **Building Permit:**
The Building Commissioner, along with the Electrical and Plumbing Inspectors, must review architectural/structural drawings and specifications and approve them in writing, prior to issuance of a building permit. All requirements in the Massachusetts Building Code, the Massachusetts Sanitary Code, and the Devens Fire Chief must be met. When this approval is obtained, the building permit may then be integrated with this Record of Decision; together they will constitute the Unified Permit for this project and in turn, allow building construction to commence.

11. **Permit Duration:**
In accordance with 974 CMR 1.10, unified permits shall remain in effect so long as the approved activities are commenced within six months of the date of the DEC or the LUA produces a written decision and approved activities are completed within two years. It is further noted that there is a thirty-day "reconsideration period" during which an applicant, a Town, or an aggrieved person may request the DEC reconsider its action (By-Laws, Article IV, Sections C through F). Work performed during this period, which begins on June 9, 2023 and terminates July 10, 2023, is "at risk". Final plans must be submitted to the Commission for endorsement by December 8, 2023.

Approved by:

6/8/23
Date

for Peter C. Lowitt, FAICP, Director
Devens Enterprise Commission

Certification ***Middlesex, SS***

I certify the above is a true action and record of the Devens Enterprise Commission and that Peter C. Lowitt, Devens Land Use Administrator/Director, is empowered by the Devens Enterprise Commission to sign this Record of Decision on its behalf.

June 8, 2023
Date

Dawn M Babcock
Dawn Babcock, Notary
My Commission expires 3/2/29

DAWN M BABCOCK
Notary Public
Commonwealth of Massachusetts
My Commission Expires
March 2, 2029

ITE TRIP GENERATION WORKSHEET
(12th Edition, Updated 2025)

LANDUSE: Research & Development Center
LANDUSE CODE: 760
SETTING/LOCATION: General Urban/Suburban
JOB NAME: **Devens CFS-3**
JOB NUMBER: **14867**

Trip Type --- Vehicle
Independent Variable --- 1,000 Sq. Feet Gross Floor Area

FLOOR AREA (KSF): 232

WEEKDAY

RATES:

	# Studies	R^2	Total Trip Ends			Independent Variable Range			Directional Distribution	
			Average	Low	High	Average	Low	High	Enter	Exit
DAILY	1	NA	9.47	9.47	9.47	42	42	42	50%	50%
AM PEAK (ADJACENT ST)	13	NA	0.48	0.17	2.19	123	10	331	78%	22%
PM PEAK (ADJACENT ST)	13	NA	0.45	0.13	1.40	123	10	331	25%	75%

TRIPS:

	BY AVERAGE			BY REGRESSION		
	Total	Enter	Exit	Total	Enter	Exit
DAILY	2,200	1,100	1,100	NA	NA	NA
AM PEAK (ADJACENT ST)	112	87	25	NA	NA	NA
PM PEAK (ADJACENT ST)	105	26	78	NA	NA	NA

TRAFFIC GROWTH CALCULATIONS - 11 GRANT ROAD

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

Notes: estimating TD and TG based on ITE
ITE LUC 760 R&D

WERFEN (Sports Arena Site) - 11 Grant Road
237850 sf
under construction
Signed_ROD_6_8_2023.pdf

INTERSECTION		MOVEMENT	NEW TRIPS ENTER	NEW TRIPS EXIT	AM PEAK HOUR TRIPS ENTER	AM PEAK HOUR TRIPS EXIT	AM PEAK HOUR TRIPS TOTAL	PM PEAK HOUR TRIPS ENTER	PM PEAK HOUR TRIPS EXIT	PM PEAK HOUR TRIPS TOTAL
1. JACKSON ROAD AT PATTON ROAD/LAKE GEORGE STREET										
Lake George Street		EB L			0	0	0	0	0	0
		EB T			0	0	0	0	0	0
		EB R			0	0	0	0	0	0
Patton Road		WB L			0	0	0	0	0	0
		WB T			0	0	0	0	0	0
		WB R			0	0	0	0	0	0
Jackson Road		NB U			0	0	0	0	0	0
		NB L			0	0	0	0	0	0
		NB T	77%		67	0	67	20	0	20
		NB R			0	0	0	0	0	0
Jackson Road		SB L			0	0	0	0	0	0
		SB T		77%	0	19	19	0	60	60
		SB R			0	0	0	0	0	0
		SUM			0	0	0	0	0	0
2. JACKSON ROAD AT GIVRY STREET										
Jackson Road	NB in new counts	NEB L			0	0	0	0	0	0
		NEB T	77%		67	0	67	20	0	20
		NEB R			0	0	0	0	0	0
Jackson Road	SB in new counts	SWB L			0	0	0	0	0	0
		SWB T		77%	0	19	19	0	60	60
		SWB R			0	0	0	0	0	0
Givry Street	WB in new counts	NWB U			0	0	0	0	0	0
		NWB L			0	0	0	0	0	0
		NWB T			0	0	0	0	0	0
		NWB R			0	0	0	0	0	0
Givry Street	EB in new counts	SEB L			0	0	0	0	0	0
		SEB T			0	0	0	0	0	0
		SEB R			0	0	0	0	0	0
		SUM								
3. JACKSON ROAD AT PINE ROAD										
Jackson Road		EB L			0	0	0	0	0	0
		EB T		7%	0	2	2	0	5	5
Jackson Road		WB T	7%		6	0	6	2	0	2
		WB R			0	0	0	0	0	0
Pine Road		SB L			0	0	0	0	0	0
		SB R			0	0	0	0	0	0
		SUM								
4. HOSPITAL ROAD AT WESTERLY SITE DRIVEWAY										
Hospital Road		EB L			0	0	0	0	0	0
		EB T	5%		4	0	4	1	0	1
		EB R			0	0	0	0	0	0
Hospital Road		WB U			0	0	0	0	0	0
		WB L			0	0	0	0	0	0
		WB T		5%	0	1	1	0	4	4
		WB R			0	0	0	0	0	0
NE Studios Driveway		NB L			0	0	0	0	0	0
		NB T			0	0	0	0	0	0
		NB R			0	0	0	0	0	0
Westerly Site Driveway (Spruce Street)		SB L			0	0	0	0	0	0
		SB T			0	0	0	0	0	0
		SB R			0	0	0	0	0	0
		SUM								

TRAFFIC GROWTH CALCULATIONS - 11 GRANT ROAD

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

Notes: estimating TD and TG based on ITE
ITE LUC 760 R&D

WERFEN (Sports Arena Site) - 11 Grant Road
237850 sf
under construction
Signed_ROD_6_8_2023.pdf

INTERSECTION	MOVEMENT	NEW TRIPS ENTER	NEW TRIPS EXIT	AM PEAK HOUR TRIPS ENTER	AM PEAK HOUR TRIPS EXIT	AM PEAK HOUR TRIPS TOTAL	PM PEAK HOUR TRIPS ENTER	PM PEAK HOUR TRIPS EXIT	PM PEAK HOUR TRIPS TOTAL
5T. HOSPITAL ROAD AT GIVRY STREET WEST									
Hospital Road	EB T	5%		4	0	4	1	0	1
	EB R			0	0	0	0	0	0
	WB T		5%	0	1	1	0	4	4
Hospital Road	NWB L			0	0	0	0	0	0
5. HOSPITAL ROAD AT GIVRY STREET WEST - WHOLE TRIANGLE									
Hospital Road	EB T	5%		4	0	4	1	0	1
	EB R			0	0	0	0	0	0
Hospital Road	WB L			0	0	0	0	0	0
	WB T		5%	0	1	1	0	4	4
Givry Street	NWB BR L			0	0	0	0	0	0
Givry Street	NWB BR			0	0	0	0	0	0
	SUM								
6. GIVRY STREET SPLIT									
Givry Street	NB T			0	0	0	0	0	0
	NB R			0	0	0	0	0	0
	SB L			0	0	0	0	0	0
Givry Street	SB T			0	0	0	0	0	0
Givry Street	SWB L			0	0	0	0	0	0
	SWB R			0	0	0	0	0	0
	SUM								
7. HOSPITAL ROAD AT GIVRY STREET EAST									
Hospital Road	EB T	5%		4	0	4	1	0	1
Hospital Road	WB L			0	0	0	0	0	0
	WB T		5%	0	1	1	0	4	4
Givry Street	NEB BR			0	0	0	0	0	0
	SUM								
8. HOSPITAL ROAD AT EASTERLY SITE DRIVEWAY (HOSPITAL LANE)									
Hospital Road	EB L			0	0	0	0	0	0
	EB T	5%		4	0	4	1	0	1
Hospital Road	WB T		5%	0	1	1	0	4	4
	WB R			0	0	0	0	0	0
Easterly Site Driveway (Hospital Lane)	SB L			0	0	0	0	0	0
	SB R			0	0	0	0	0	0
	SUM								
9. GRANT ROAD AT HOSPITAL ROAD									
Hospital Road	EB L			0	0	0	0	0	0
	EB R			0	0	0	0	0	0
Grant Road	NB L			0	0	0	0	0	0
	NB T		11%	0	3	3	0	9	9
Grant Road	SB T	11%		10	0	10	3	0	3
	SB R			0	0	0	0	0	0
	SUM								
10. GRANT ROAD AT PINE ROAD									
Pine Road	WB L			0	0	0	0	0	0
	WB R			0	0	0	0	0	0
Grant Road	NB U			0	0	0	0	0	0
	NB T		11%	0	3	3	0	9	9
	NB R			0	0	0	0	0	0
Grant Road	SB L			0	0	0	0	0	0
	SB T	11%		10	0	10	3	0	3
	SUM			0	0	0	0	0	0

TRAFFIC GROWTH CALCULATIONS - 11 GRANT ROAD

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

Notes: estimating TD and TG based on ITE
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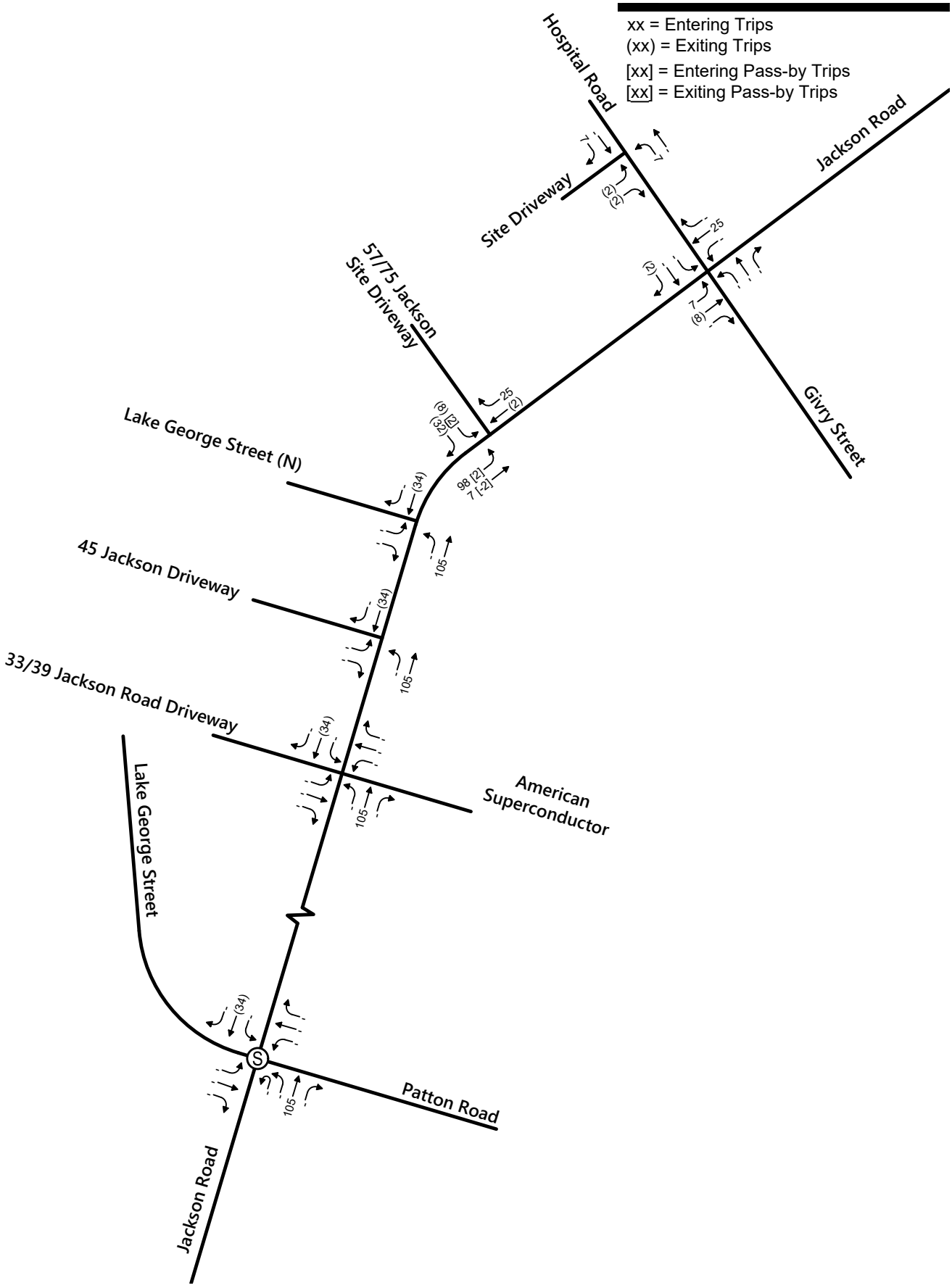
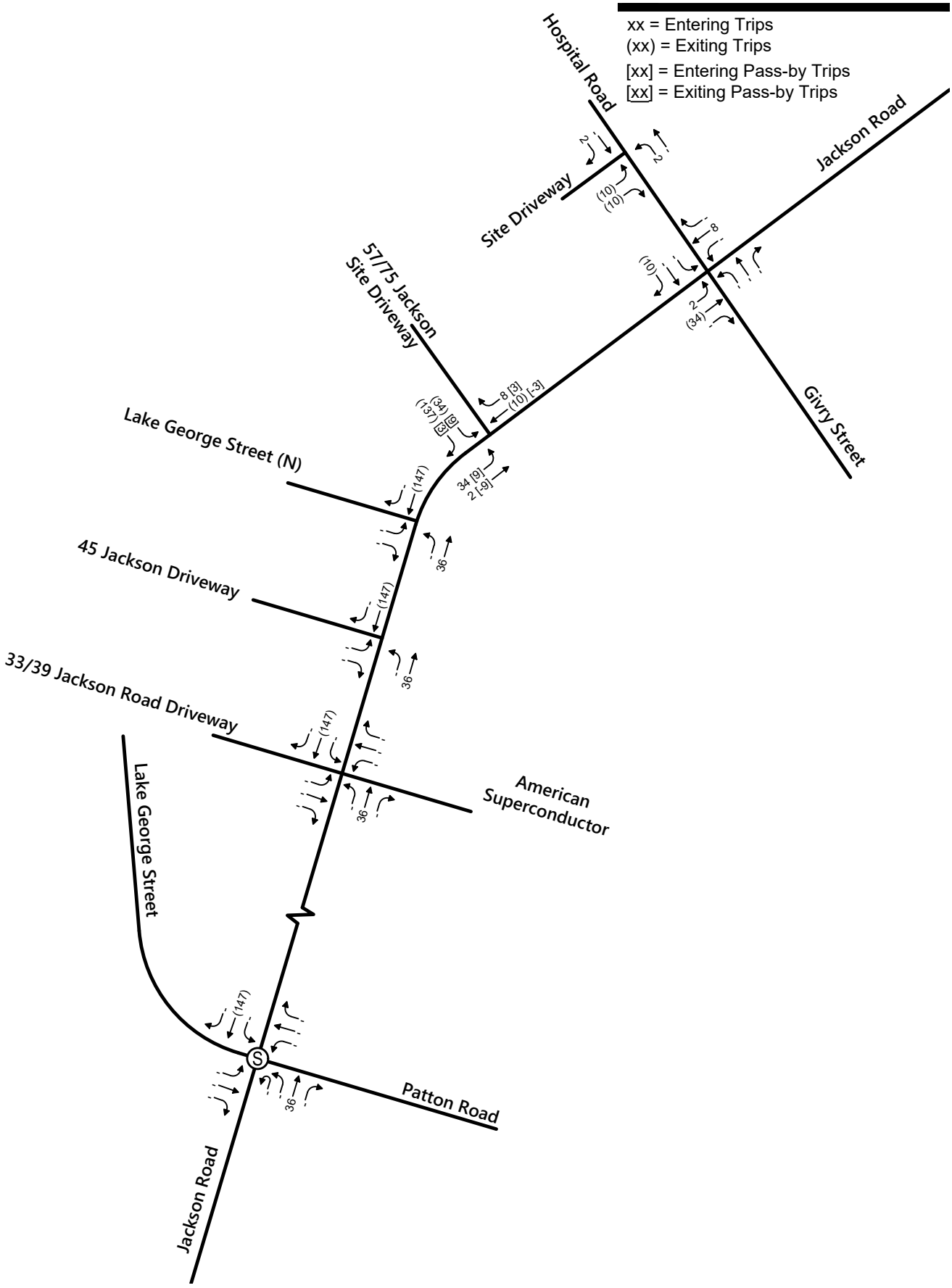
11. FRONT STREET AT HOSPITAL ROAD									
Front Street	EB T			0	0	0	0	0	0
	EB R	5%		4	0	4	1	0	1
Front Street	WB L			0	0	0	0	0	0
	WB T			0	0	0	0	0	0
Hospital Road	NB L		5%	0	1	1	0	4	4
	NB R			0	0	0	0	0	0
	SUM								
			TRIP GEN	87	25	112	26	78	104



Not to Scale

Figure 9

Site-Generated Trips
Weekday Morning Peak Hour
Proposed Development - Building 4/5
57/75 Jackson Road, Devens, Massachusetts



Not to Scale

Figure 10

Site-Generated Trips
Weekday Evening Peak Hour
Proposed Development - Building 4/5
57/75 Jackson Road, Devens, Massachusetts

October 26, 2022

Certified Mail 7012 2210 0000 3901 2527

Eugene Sullivan
Eugene T. Sullivan, Inc.
230 Lowell St, Suite 2A
Wilmington, MA 01887

Re: 35 Saratoga Property Owner LLC. Ave., Devens, MA Unified Permit Approval

Dear Mr.Sullivan,

Please find enclosed the original signed Unified Permit Record of Decision (ROD) for the construction of a +/-154,000 sq.ft. new industrial building, with associated grading, landscaping, parking, stormwater, and utility improvements. Property located at 35 Saratoga Boulevard, Devens (Harvard), MA. This approval was granted by the Devens Enterprise Commission (DEC) at its October 25, 2022 meeting.

Please ensure the ROD is recorded in the Worcester County Registry and notify the DEC office of the Volume and Page number once the ROD has been recorded. Please also note, there is a 30-day appeal period (from the date of the Decision) that expires on November 25, 2022. No construction activity is authorized until the appeal period ends and the applicable conditions of approval in the Record of Decision have been addressed.

Feel free to contact me with any questions.

Sincerely,

Neil Angus, FAICP CEP, LEED AP, LFA
Environmental Planner

cc: Ayer Town Clerk (certified)
Harvard Town Clerk (certified)
Shirley Town Clerk (certified)
Meg Delorier, EVP Devens
Tania Hartford, EVP Real Estate, MassDevelopment
Steven Goodman, GFI Partners

Record of Decision
35 SARATOGA PROPERTY OWNER, LLC.
35 Saratoga Boulevard (Parcel ID #021.0-0-0013-01600.0)
Devens (Harvard), MA
October 25, 2022

1. **Owner/Applicant:**
   35 Saratoga Property Owner, LLC, 133 Pearl Street, Boston MA 02110.

2. **Premises and Proposed Project:**
   The applicant is seeking a Level 2 Unified Permit for Site Plan Approval for the construction of a +/-154,000 sq.ft. new industrial building, with associated grading, landscaping, parking, stormwater, and utility improvements. Property located at 35 Saratoga Boulevard, Devens (Harvard), MA (Deed Reference: Bk: 5040 Pg. 287) in the Rail, Industrial, Trade-Related Uses, Open Space and Recreation Zone, Zone II and Watershed WRP Overlay Districts.

3. **Submission:**
   The application includes the following, which all become part of the record:

   1. Level 2 Unified permit Application package including the following:
      - Cover Letter from Gene Sullivan, dated April 7, 2022 (3 pages)
      - DEC Completed Application Form (#D22-033) submitted 4/7/22
      - Application fee
      - Industrial Performance Standards Checklist
      - Long term Pollution and Operations and Maitneancen Plans
      - LEED Green Building Rating System Project Checklist
      - Certified Abutters List
   2. Site Plans Entitled: "Proposed Building 35 Saratoga Boulevard, Devens, Massachusetts", prepared by Eugene T. Sullivan, Inc., Dana F. Perkins, Inc., and James K. Emmanuel Associates; dated April 6, 2022, including the following sheets:
      - Cover Sheet
      - EC.1 – Erosion and Sediment Control Plan
      - C.1 – Existing Conditions
      - C.2 – Site Layout
      - C.3 - Drainage and Utilities
      - C.4.1 - Construction Details
      - C.4.2 – Construction Details
      - SL-1 – Site Lighting Plan
   3. Public Hearing Notice to abutters and interested parties (including certified mail return receipts) dated April 12, 2022;
   4. Public Hearing legal notice publication memo to Nashoba Publications, dated April 12, 2022 (publication dates April 29, 2022 and May 6, 2022);
   5. Public Hearing Notice to Board of Selectman and Planning Boards, Towns of Ayer, Harvard and Shirley, dated April 12, 2022 (received April 19, 2022) from Peter Lowitt, Director DEC.
   6. Public Hearing Notice to Town Clerks of Ayer, Harvard, Shirley, Lancaster, MassDevelopment, dated April 12, 2022, from Peter Lowitt/Dawn Babcock.
   7. Community Cable Advisory Committee notice, dated April 12, 2022, to run April 12-May 31, 2022;
   8. Public Hearing Notice to the Secretary of State, dated April 12, 2022.

9. Determination of Completeness, dated April 12, 2022, signed by Peter Lowitt.
10. Plan Circulation memo dated April 14, 2022, from Neil Angus to MassDevelopment Re: Unified Permit Application – 35 Saratoga Boulevard (1 Page);
11. Storm Drainage Management Report: 35 Saratoga Boulevard, Devens, Massachusetts, dated April 20, 2022, prepared by Eugene T. Sullivan (130 pages);
12. Supplemental Filing cover letter from Eugene Sullivan, dated April 21, 2022; Project: PROPOSED BUILDING, 35 Saratoga Boulevard, Devens, Massachusetts (2 pages);
13. Revised Site Plans Entitled: "Proposed Building 35 Saratoga Boulevard, Devens, Massachusetts", prepared by Eugene T. Sullivan, Inc., Dana F. Perkins, Inc., and James K. Emmanuel Associates; dated April 20, 2022, including the following sheets:
    - Cover Sheet
    - EC.1 – Erosion and Sediment Control Plan
    - C.1 – Existing Conditions
    - C.2 – Site Layout
    - C.3 - Drainage and Utilities
    - C.4.1 - Construction Details
    - C.4.2 – Construction Details
    - SL-1 – Site Lighting Plan
    - L1 – Landscape Plan
    - A.1 – Building Elevations
14. Zoning Table PDF (1 page), submitted April 27, 2022
15. Landscape Plan Peer Review comments from John Amodeo, IBI Group, to Neil Angus, dated May 2, 2022 (4 pages);
16. Peer Review Engineering comments from Jennifer Johnson, Nitsch Engineering, to Neil Angus, dated May 4, 2022 (7 pages);
17. Response to 5/2/22 IBI peer review comments – PDF from Gene Sullivan, submitted on 5/26/22 (6 pages);
18. Response to 5/4/22 Nitsch Engineering comments – PDF from Gene Sullivan, submitted 5/25/22 (9 pages);
19. DEC Staff Report, dated 5/27/22 (4 Pages);
20. Sight Distance Report – Gene Sullivan response to comments from Nitsch Engineering on original Traffic Report for 35 Saratoga Boulevard – submitted 5/31/22 (39 pages)
21. DEC Staff Report, dated 6-6-22 (4 Pages);
22. Traffic Study Sight Line Comments from John Marc-Aurele – PDF dated 6/7/22 (1 plan sheet)
23. Notes to file regarding sight distance and access to 35 Saratoga from Barnum Road, dated 6/8/22 (1 page);
24. Disclosure of Appearance of Conflict of Interest filed with the State Ethics Committee by Deborah Seeley, dated 6/13/22;
25. 35 Saratoga/Barnum Road Truck Turning Movement and Access Plan (PDF submitted 6/22/22 (1 page);
26. DEC Staff Report, dated 6-21-22 (5 Pages);
27. Revised Site Layout for 35 Saratoga (draft), prepared by Gene Sullivan, submitted on 6/29/22 (1 plan sheet);
28. Revised Site Layout for 35 Saratoga (draft), prepared by Gene Sullivan, submitted

on 7/7/22 (1 plan sheet);

29. Revised Site Layout for 35 Saratoga - raised island added to Barnum Road Access (draft), prepared by Gene Sullivan, submitted on 7/11/22 (1 plan sheet);
30. Proposed Warehouse – 35 Saratoga Boulevard, Devens, MA Sight Distance Plans entitled "Figure 1: Stopping Site Distance Approaching from the East" and "Figure 2: Intersection Sight Distance Driveway Looking East"; scale 1"=40'; submitted 7/25/22; Prepared by Bayside Engineering, 16 Unicorn Park Drive, Woburn, MA (2 pages);
31. Memo to DEC from Peter Lowitt, dated 7/25/22 Re: Update on 35 Saratoga Boulevard (1 page);
32. Revised Site Plans Entitled: "Proposed Building 35 Saratoga Boulevard, Devens, Massachusetts", prepared by Eugene T. Sullivan, Inc., Dana F. Perkins, Inc., and James K. Emmanuel Associates; dated July 25, 2022, including the following sheets:
    - Cover Sheet
    - EC.1 – Erosion and Sediment Control Plan
    - C.1 – Existing Conditions
    - C.2 – Site Layout
    - C.3 - Drainage and Utilities
    - C.4.1 - Construction Details
    - C.4.2 – Construction Details
    - SL-1 – Site Lighting Plan
    - L1 – Landscape Plan
    - A.1 – Building Elevations
33. Cover Letter for revised submittal and waiver request list dated 7/25/22, from Gene Sullivan (17 pages);
34. Revised Storm Drainage Report, dated 7/25/22; prepared by Gene Sullivan (168 pages);
35. Landscape Plan for 35 Saratoga Boulevard prepared by James K. Emmanuel Associates, 22 Carlton Road, Marblehead, MA (Sheet L.1), Dated July 28, 2022;
36. Sight Distance Report – Gene Sullivan response to comments from Nitsch Engineering on original Traffic Report for 35 Saratoga Boulevard – submitted 5/31/22 (39 pages)
37. Gene Sullivan response to Traffic study comments #23 and 26 from Nitsch Engineering; submitted 8-22-22 (2 pages);
38. IBI review notes 35SB-Landscape_IBIG-REV2-2022-08-18-draft on revised plans and letter from Gene Sullivan, dated 7/25/22 requesting retaining wall waiver (28 pages)
39. Letter from Peter Lowitt to Gene Sullivan (sent on August 24, 2022) Re: 35 Saratoga outstanding review comments (1 page);
40. Mullin Rule Affidavit, dated 8/24/22, from Commissioner Fetterhoff re: July 26, 2022 public hearing;
41. June 9, 2022 Public Hearing Postponement Notice (to June 16, 2022) due to insufficient public notice under MA Open meeting Law (notice posted on hearing room door, 33 Andrews Parkway building, DEC website, and sent to Ayer, Harvard and Shirley Town clerks for posting). Posted 6/8/22 at 10:00AM.
42. Landscape Plan Peer Review comments (2nd round) from John Amodeo, IBI Group, to Neil Angus, dated August 24, 2022 (11 pages);
43. Peer Review Engineering comments (2nd round) from Jennifer Johnson, Nitsch

Engineering, to Neil Angus, dated August 24, 2022 (11 pages);
44. Peer Review Traffic study comments (2nd round) from Jennifer Johnson, Nitsch Engineering, to Neil Angus, dated August 26, 2022 (9 pages);
45. August 30th Public Hearing extension and 75-Day decision period extension request from Gene Sullivan, dated August 29, 2022 (continue to September 27, 2022);
46. Mullin Rule Affidavit, dated 8/29/22, from Commissioner Lilly re: July 26, 2022 public hearing;
47. Updated Conceptual Site Plan dated 9-23-22 (1 page PDF from gene Sullivan);
48. Memo to DEC from Peter Lowitt, dated 9/26/22 Re: 35 Saratoga Unified Permit update on Plan Review Status (II) (1 page);
49. 25 Saratoga Boulevard Truck Access and Fire Access Turning Maneuver Plans (sheets C5.1 and C.5.2), dated 4/6/22, revised through 10/12/22;
50. Nitsch and IBI review of 35 Saratoga Discussion Notes 10-20-22;
51. Additional pavement Reduction Concept 10-23-22;
52. Gene Sullivan response to 2nd round of Landscape Plan Peer Review comments from John Amodeo, IBI Group, dated October 11, 2022 (12 pages);
53. Gene Sullivan response to 2nd round of Peer Review Engineering comments, dated October 11, 2022 (12 pages);
54. Response to August 26, 2022 Peer Review Traffic study comments from Kenneth Cram, Bayside Engineering to Neil Angus, dated October 11, 2022 (29 pages);
55. Revised Site Plans Entitled: "Proposed Building 35 Saratoga Boulevard, Devens, Massachusetts", prepared by Eugene T. Sullivan, Inc., Dana F. Perkins, Inc., and James K. Emmanuel Associates; dated October 12, 2022, including the following sheets:
    - Cover Sheet
    - EC.1 – Erosion and Sediment Control Plan
    - C.1 – Existing Conditions
    - C.2 – Site Layout
    - C.3 - Drainage and Utilities
    - C.4.1 - Construction Details
    - C.4.2 – Construction Details
    - SL-1 – Site Lighting Plan
    - L1 – Landscape Plan
    - A.1 – Building Elevations
56. Cover Letter for revised submittal and waiver request list dated 10/12/22, from Gene Sullivan, dated 10/12/22;
57. Revised Storm Drainage Report, dated 10/12/22; prepared by Gene Sullivan (179 pages);
58. Landscape Plan Peer Review comments (3rd round) from John Amodeo, IBI Group, to Neil Angus, dated October 24, 2022 (16 pages);
59. Peer Review Engineering comments (3rd round) from Jennifer Johnson, Nitsch Engineering, to Neil Angus, dated October 20, 2022 (14 pages);
60. Draft Record of Decision, dated 10/25/22 (9 pages);
61. Draft Record of Decision, dated 10/25/22 revised (13 pages);
62. Email correspondence as follows:

To:	From:	Date:	Subject:
Neil Angus	Eugene Sullivan	4/7/22	35 Saratoga Boulevard1
Neil Angus	Eugene Sullivan	4/21/22	35 Saratoga Boulevard
Peter Lowitt	Eugene Sullivan	7/25/22	35 Saratoga Boulevard
Beth Suedmeyer	Neil Angus	10/24/22	FW: Turning studies

To:	From:	Date:	Subject:
Peter Lowitt	Gene Sullivan	10/20/22	RE: Checking for information that ttest pits or borings done in the infiltration areas
Peter Lowitt	Gene Sullivan	10/20/22	RE: 35 Saratoga
Peter Lowitt	Gene Sullivan	10/20/22	RE: 35 Saratoga (geotech)
Tim Kelly	Neil Angus	10/20/22	Fwd: 35 Saratoga
Peter Lowitt	Gene Sullivan	4/19/22	RE 35 Saratoga waiver request
Neil Angus	Mark Cohen	4/15/22	RE 35 Saratoga New Building Proposal
Peter Lowitt	Gene Sullivan	4/27/22	RE 35 Saratoga
Neil Angus	John Marc-Aurele	4/28/22	RE: 35 Saratoga off-site allocation
Jenn Johnson	Neil Angus	5/4/22	RE 35 Saratoga Review - Site Stormwater and Sight Distance1
Neil Angus	Jennifer Johnson	5/5/22	RE 35 Saratoga Review - Site Stormwater and Sight Distance2
Neil Angus	Jennifer Johnson	5/4/22	RE 35 Saratoga Review - Site Stormwater and Sight Distance
Neil Angus	John Marc-Aurele	5/5/22	35 Saratoga
Jenn Johnson	Neil Angus	4/21/22	FW 35 Saratoga Boulevard
Neil Angus	John Marc-Aurele	5/6/22	RE 35 Saratoga 1
Gene Sullivan	Neil Angus	5/10/22	RE 35 Saratoga Review1
Gene Sullivan	Neil Angus	5/5/22	35 Saratoga Review
Neil Angus	Gen Sullivan	5/26/22	35 Saratoga Boulevard 2
Neil Angus	Gene Sullivan	5/26/22	RE 35 Saratoga Boulevard1
Neil Angus	John Marc-Aurele	5/6/22	RE 35 Saratoga
Neil Angus	Gene Sullivan	5/27/22	RE 35 Saratoga Review
Peter Lowitt	Jenn Johnson	6/7/22	RE updated traffic study sight distance Nitsch response
Peter Lowitt	John Marc-Aurele	6/7/22	RE updated traffic study sight distance
Neil Angus	Gene Sullivan	6/13/22	35 Saratoga Boulevard
Peter Lowitt	Gene Sullivan	6/30/22	RE 35 Saratoga Boulevard spaces revised
Peter Lowitt	Gene Sullivan	7/722	RE 35 Saratoga Boulevard 6
Peter Lowitt	Gene Sullivan	6/30/22	RE 35 Saratoga Boulevard
Gene Sullivan	Neil Angus	7/18/22	RE 35 Saratoga Boulevard na
Neil Angus	Gene Sullivan	7/18/22	RE 35 Saratoga Boulevard gs
Peter Lowitt	Gene Sullivan	7/25/22	RE 35 Saratoga Boulevard725
Peter Lowitt	Gene Sullivan	7/25/22	Re 35 Saratoga Boulevard7252
Peter Lowitt	Jenn Johnson	7/25/22	RE 35 Saratoga Boulevard725jj
Peter Lowitt	Gene Sullivan	7/25/22	RE 35 Saratoga Boulevard725 sight distance
Peter Lowitt	James Kros	7/26/22	RE 35 Saratoga Boulevardjk
Peter Lowitt	Gene Sullivan	7/26/22	Re 35 Saratoga Boulevardgs
Peter Lowitt	Jenn Johnson	7/26/22	RE 35 Saratoga Boulevard revised sight distance comments Nitsch
Peter Lowitt	Gene Sullivan	7/28/22	35 Saratoga 1
Neil Angus	Peter Lowitt	8/8/22	Fwd Please send landscape plan
Peter Lowitt	Jenn Johnson	8/15/22	RE 35 Saratoga Boulevard traffic query
Peter Lowitt	Gene Sullivan	8/16/22	Please send along the revisions to the traffic study for 35 Saratoga
Peter Lowitt	Gene Sullivan	7/25/22	RE 35 Saratoga Boulevard A
Gene Sullivan	Peter Lowitt	7/25/22	RE: 35 Saratoga Boulevard
Neil Angus	Mark Cohen	7/29/22	RE 31 Independence Plan Circulation
Peter Lowitt	Gene Sullivan	8/22/22	RE Please resend extension and continuation of public hearing request for 35 Saratoga
Neil Angus	Jenn Johnson	8/18/22	35 Saratoga, review #2
Neil Angus	Paige Simmons	8/24/22	RE 35 Saratoga review #2
Neil Angus	Jenn Johnson	8/26/22	35 Saratoga - Traffic
Jenn Johnson	Neil Angus	8/26/22	RE 35 Saratoga - Traffic
Peter Lowitt	Neil Angus	8/26/22	RE 35 Saratoga - Traffic1

To:	From:	Date:	Subject:
Neil Angus	Jenn Johnson	8/26/22	RE 35 Saratoga - Traffic1.2
Peter Lowitt	Neil Angus	8/25/22	RE 35 Saratoga Comments
James Kros	Neil Angus	8/25/22	RE: 122047 - 35 Saratoga Project Review - IBI Group Review 2 Responses
Neil Angus	James Kros	8/25/22	122047 - 35 Saratoga Project Review - IBI Group Review 2 Responses
Jenn Johnson	Neil Angus	8/25/22	RE 35 Saratoga Comments 3
James Kros	Jenn Johnson	8/25/22	RE 35 Saratoga Comments 3.1
Peter Lowitt	Gene Sullivan	8/29/22	35 Saratoga Boulevard extension request to 92722
Peter Lowitt	Gene Sullivan	9/22/22	RE 31 Independence and 35 Saratoga continuance to 1026
Gene Sullivan	Peter Lowitt	9/28/22	Can you please send along the continuation request for 35 Saratoga to the 10-25 DEC public hearing at 645 pm
Peter Lowitt	Gene Sullivan	10/4/22	RE Plans for 35 Saratoga and 31 Independence so we can begin our reviews1
Peter Lowitt	Gene Sullivan	10/11/22	Resubmittal of 35 Saratoga Boulevard
Jenn Johnson	Neil Angus	10/12/22	Fwd Resubmittal of 35 Saratoga Boulevard
Peter Lowitt	Gene Sullivan	10/20/22	35 Saratoga
Gene Sullivan	Peter Lowitt	10/11/22	RE_ Plans for 35 Saratoga and 31 Independence so we can begin our reviews
Neil Angus	Gene Sullivan	10/24/22	RE_ Resubmittal of 35 Saratoga Boulevard
Beth Suedmeyer	Paige Simmons	10/24/22	RE_ 35 Saratoga
Neil Angus	Tim Kelly	10/24/22	Turning studies
Neil Angus	Paige Simmons	10/25/22	RE: 35 Saratoga - IBI Group Review 3 Comments

4. **Unified Permit Components and Actions:**
The Unified Permit for this project includes Site Plan Approval for the construction of a +/-154,000 sq.ft. new industrial building, with associated grading, landscaping, parking, stormwater, and utility improvements. Property located at 35 Saratoga Boulevard, Devens (Harvard), MA.

5. **Process:**
35 Saratoga Property Owner, LLC, submitted a Level II Unified Permit application package on April 7, 2022 and the Determination of Completeness was issued on April 12, 2022. Copies of the application were received by the surrounding Towns on April 19, 2022. Legal notices were placed in Nashoba Publications on April 29, 2022 and May 6, 2022. All abutting property owners were duly notified by certified mail. The 30-day Town comment period expired on May 20, 2022. No public comments were received. The Commission opened the hearing on May 31, 2022 and continued it until June 9, 2022. The June 9, 2022 meeting was postponed to June 16, 2022 at which time the Commission accepted an extension request by the Applicant and continued the hearing to June 28, 2022. The Commission re-opened the hearing on June 28, 2022 and the Applicant requested another extension to the July 26, 2022 meeting. The Commission re-opened the hearing on July 26, 2022 and accepted another extension request from the Applicant and continued the hearing to August 30, 2022. The Commission re-opened the

hearing on August 30, 2022 and accepted another extension request from the Applicant and continued the hearing to September 27, 2022. The Commission re-opened the hearing on September 27, 2022 and accepted another extension request from the Applicant and continued the hearing to October 25, 2022 where the hearing was re-opened and closed.

6. **Waivers:**
The Applicant requested the following waivers as part of this application.

   a) *974 CMR 3.04(1)(a) Side Yard Setback of 10' - waiver for the retaining walls being located within the side yard setback.*
   Partial relief requested to allow for a retaining wall within the setback between this property and 29 Saratoga Boulevard only. The site topography, in combination with soil conditions, [the majority of the site contains ledge, and design to provide a balanced site to avoid soil removal and comply with Devens Soil management Policy] impacts the development of the property.

   b) *974 CMR 3.04(8)(h)2. requires one tree per 25 lineal feet of parking perimeter plus one tree per 50 feet in areas where screening is required.*
   Partial relief requested from this requirement in certain locations on the eastern and western boundaries of the property due to proposed retaining wall and slope and ledge restrictions.

   c) *974 CMR 3.04(8)(g) landscape screening requirements along eastern property line.*
   To provide relief from screening requirements along the Eastern property line. Applicant is proposing to provide plantings adjacent to the retaining wall on the 29 Saratoga Property and has agreed to supplement any required screening between 29 Saratoga Boulevard and 11 Saratoga Boulevard with a vegetated wall if the existing wooded buffer is developed in the future.

   d) *974 CMR 3.04(8)(g) landscape screening requirements along western property line.*
   Partial relief requested from screening requirements along the eastern property line due to slope and ledge restrictions.

   e) *974 CMR 3.04(3)(a)4.d. Driveway widths no greater than 24' in width.*
   Partial relief requested for the driveway apron off of Barnum Road. Additional pavement reduction will be undertaken on the final plans to reduce the portion of this drive that exceeds 24'.

The Commission voted all in favor to partially grant all waivers with corresponding conditions to reinforce the portions of the project that these partial waivers apply to.

7. **Findings:**
The DEC finds that:
1. The proposed general use is a permitted use in the Rail, Industrial and Trade-Related Uses District as per Exhibit D of the Devens Bylaws.

2. The project is located within a Watershed and Zone 2 Water Resources Protection District. The final plans, with the conditions listed herein, comply with the Stormwater Management Provisions and Water Resource Protection District Regulations in 974 CMR 4.08 to protect the ground and surface water resources through the implementation of best management practices during construction as well as long-term.
3. The on-site Storm Water Management system has been designed so that there are no untreated discharges from the site– all runoff will be pretreated through an on-site treatment train that includes on-site infiltration, and mechanical filtration. Discharges from the site, with conditions, have been designed to meet the MA DEP SWM Standards and DEC regulations in order to satisfy EPA MS4 requirements. Discharge to the Devens Municipal Stormwater System is under the jurisdiction of and subject to the review and approval of the Devens Engineering Department.
6. Regarding the approval criteria listed in 974 CMR 3.03(2):
   (a) The Site Plan, with conditions, complies with 974 CMR 3.00 and with the applicable provisions of the By-Laws.
   (b) The development lies on a lot that is recorded at the Registry of Deeds.
   (c) The application is Complete.
   (d) All access is designed to provide for safe vehicular and pedestrian travel.
   (e) Access and circulation enables prompt fire, police, and emergency response.
   (f) Adequate capture and discharge of stormwater and surface water runoff and compliance with applicable portions of the "Devens Stormwater Pollution Prevention Plan" has been achieved.
   (g) Connections with Devens utility, power and communication systems exist and new connections will be approved by MassDevelopment.
   (h) Facilities required under the Water Resources Protection Bylaw and the related Design Standards have been included.
   (i) The plans comply with Landscaping Design Standards through the preservation of existing specimen trees and wooded areas to the maximum extent feasible, with conditions.
   (j) A wetlands order of conditions is not applicable to this project.
   (k) Industrial Performance Standards will be adhered to as per the final plans.
   (l) The proposed use provides sufficient parking for the intended use;
   (m) The project will not interfere with existing traffic patterns.
   (n) The applicant will participate in the Devens Transportation Management Initiative.
   (o) Adequate water supply exists in terms of quantity, quality, and water pressure for domestic needs and fire protection.
   (p) Connection to sanitary sewers will be made for this project.
   (q) The building design, with conditions, will meet the minimum standards as established by Mass Development for the district in which the lot is located.
   (r) Soil testing indicates that the soils are capable of supporting the proposed development. Additional testing is required to confirm;
   (s) The development, with conditions, has been designed with due consideration for public health;

(t) Adequate climate change mitigation, adaptation and greenhouse gas emission mitigation measures have been conditioned and incorporated in accordance with 974 CMR 4.11.

8. Conditions:

The DEC voted to impose the following conditions:

1) Wherever "Applicant" is referenced in the Conditions set forth herein, it refers to the Applicant, its successors and assigns. Wherever "DEC" or "Commission" is referenced, it shall refer to the Devens Enterprise Commission, its successors and assigns.

2) In accordance with the Devens By-Laws, Article III, Section K 1. a., no soil, loam, sand, gravel, or other earth materials shall be permanently removed from any lot within Devens, except in accordance with the Devens Soil Management Policy and approval from the DEC.

3) Prior to commencing any intrusive earth work within Devens (due diligence, construction of otherwise) all personnel to be on site shall view an Unexploded Ordinance/Munitions of Explosive Concern (UXO/MEC) video briefing provided by the Devens Fire Department.

4) Once the appeal period has expired, the Applicant shall submit final approved plans to the DEC for endorsement. The Applicant shall file the endorsed plans, along with the Record of Decision, with the Registry of Deeds and proof of recordation shall be submitted to the DEC prior to the issuance of a building permit. Plans shall conform to Worcester Registry recording requirements.

5) All applicable federal, state, and local permits necessary for the construction and operation of the facility must be obtained, including, but not limited to, an EPA Construction General Permit and Driveway curb cut permit from MD/Devens Public Works. Copies of permits issued by those other than the DEC must be filed with the DEC prior to commencement of any operations.

6) There is no approval of signs implicitly or explicitly granted in this Unified Permit and any erection of signs of any type will require subsequent DEC approval.

7) Jackson Gate from Route Two shall be the primary means of truck access to and from the site on a permanent basis, with other gates to be used only in an emergency situations or during protracted construction when the Jackson gate is unavailable. The Applicant shall post signs that all trucks must enter and exit Devens via the Jackson Gate at Route 2 on the exit gate of the facility. The Applicant shall take appropriate measures to encourage all automobile traffic associated with this project to use Jackson Gate to the maximum degree feasible.

8) Prior to issuance of a building permit, the Applicant shall submit a design review approval letter from Mass Development for the project. The Project shall remain in compliance with the Devens Industrial Park Design Guidelines as may be amended (the "Design Guidelines") and/or waived. The Applicant shall adhere to any comments and conditions included in the design approval letter.

9) The Applicant shall file annual reports to the DEC in October of each year indicating how they are maintaining their on-site stormwater management facilities. This is an on-going condition once construction is completed.

10) The applicant is required to submit a letter confirming a one-year guarantee of all approved landscaping once installed. Any dead or damaged landscaping must be replaced promptly. An Irrigation system is not part of this approval. The Applicant is required to obtain administrative approval for any future proposed irrigation. Such system must comply with 974 CMR 4.08 and 8.09.

11) The Applicant shall provide As-Built Plans and accompanying information for all site improvements in accordance with the DEC As Built Policy, prior to issuance of a final Certificate of Occupancy.

12) Any proposed tenant will need to be reviewed and approved by the DEC and the Devens Public Safety Officer to ensure compliance with the Devens Bylaws and allowable uses in the Rail, Industrial and Trade Related Uses District.

13) Prior to a Certificate of Occupancy, the Long-Term Stormwater Operations and Maintenance Plan shall be updated to ensure compliance with the Devens Stormwater Pollution Prevention Plan and Devens Water Resources Protection Report. The Applicant shall file a Spill Prevention Control and Countermeasures Plan that includes a complete listing of all chemicals to be used and accompanying MSDS reports. This plan shall be submitted for review and approval by the DEC and the Devens Fire Chief prior to issuance of a Certificate of Occupancy. The Applicant shall obtain all necessary permits from the Devens Fire Department for the storage of gasses, flammables and combustibles. Storage of flammables and combustibles shall comply with 527 CMR 14.03 and 974 CMR 4.09.

14) To help reduce single occupancy vehicle use and parking, The Applicant shall become members of the Devens Transportation Management Association [TMA] and implement additional traffic mitigation measures.

15) The facility shall comply with the Massachusetts Anti-Idling law (5-minute restriction). The Applicant shall post signage at all loading docks and drop-off areas notifying drivers of this requirement.

16) Prior to DEC endorsement, the final plans shall be revised to include the following:

   a) All roof leaders shall be shown as tying into the proposed 24" HDPE drainage pipe along the east side of the building.
   b) phosphorus removal calculations shall be updated to be consistent with the methodology from the Massachusetts Small MS4 Permit requirements.
   c) The Applicant shall perform a minimum of two (2) additional test pits in the locations of the proposed underground infiltration system and each of the porous pavement areas to confirm drainage design assumptions. Should the test pits reveal different materials, the Applicant will be required to re-design the system(s) to ensure full compliance with 974 CMR 4.08. Overblasting may be required for any proposed porous pavement areas over existing ledge that do not have sufficient depth and required permeability.
   d) ADA parking details, including striping and signage, shall be added to the plans.

e) Guardrail locations shall be clarified and details added to the plans.
f) Tree protection details shall be added to the plans.
g) Provide indication on the plans where bare rock is expected to occur in relation to where screening is required.
h) The parking table shall be updated and in accordance with 974 CMR 304(3)(a)10., include a minimum of 5% of total parking spaces (including reserve) for EV charging, 5% of the total spaces (including reserve) for carpooling/rideshare, and 5% of the total parking spaces (including reserve) for hybrid/low-emitting vehicle parking.
i) Include an updated turning movement plans using the Devens Fire Department Engine 4 and Tower ladder truck turning templates. The Barnum Road access drive and adjacent paved areas shall be reduced in size to eliminate unnecessary/excessive pavement. Porous pavement or reinforced turf may be used for any extra pavement areas required only for emergency access. The paved triangle at the Barnum Road entrance shall be constructed of pervious pavement as well.
j) Include notes and details to ensure all slopes with a grade of 3:1 (H:V, 33.3%) or steeper, with the exception of stable exposed ledge areas, shall be reinforced with biodegradable jute mesh for stabilization control (include detail on final plans), in addition to hydroseeding with a variety of grasses that will form a strong fibrous root system as indicated in 3.04 (8) (f) 3 to hold soil in place, in addition to required understory landscape plantings that include nut caches, seedlings, saplings, and live stakes (including but not limited to a plant palette includes 1" whip native trees and shrub species appropriate to early and future successional growth for the naturally wooded slopes at Devens such as the shrub species of blueberry, rhododendron, winterberry, bayberry, shrub dogwoods, cranberry bush, spicebush, and native viburnums.
k) Provide additional shade tree plantings along the westerly boundary where feasible. Include a note on the plans that the Applicant will work with the adjacent property owner to the north to obtain permission to plant and maintain additional shade trees. Should the required plantings not be able to be installed, the Applicant will plant the equivalent of the additional required shade trees in another location in Devens to the satisfaction of the Commission.
l) Pipe length/slope on plan shall match the HydroCAD report
m) All existing trees and woodland to remain shall be shown on ALL site plan sheets.
n) Site lighting plan shall be revised to reduce lumen levels around all SL1 lighting fixtures. Typical light levels are 0.5 fc and maximum light levels should be no greater than 2.0-2.5 fc.
o) Landscape plans shall be revised to include native grasses, straight species (vs. hybrids and cultivars), and evergreen species appropriate to this horticultural zone.
p) A space for the DEC Chair signature and date to endorse shall be included on all plans
q) Approved waivers shall be added to the plan cover sheet.
r) All remaining comments from Devens Utilities and Devens Engineering shall be addressed.

17) To comply with 974 CMR 4.11 Greenhouse Gas Mitigation regulations, the Applicant shall:
   a) Join the Devens Eco-Efficiency Center and demonstrate compliance with EcoStar Standard #24
   b) Design the building to comply with the MA Stretch Energy Code (780CMR 120AA)
   c) Install a vegetated roof, in accordance with the Devens Enterprise Commission's Vegetated Roof Policy, or a white/high albedo roof, to reduce urban heat island impacts associated with the proposed development.

18) Prior to issuance of a Certificate of Occupancy, the Applicant shall update the Long-Term Operations and Maintenance Plan to include details on how the proposed seeding and plantings will be established and maintained. Include temporary irrigation, required soil amendments, and additional measures to ensure successful establishment, growth, and ongoing care. This plan should also address how stabilization and maintenance of 2:1 slopes that are not ledge will be maintained (not mowable at this grade).

19) The Applicant shall survey locate and mark all property boundaries in the field and maintain the approved limits of disturbance. There shall be no encroachment on any adjacent properties without written permission from the property owner. Copies of any easement agreements must be filed with the DEC prior to commencement of any construction.

20) Should the existing landscape screening along the adjacent property line with parcel 021.0-0013-0100.0 (11 Saratoga Boulevard) ever be removed, within 12 months of such removal, the Applicant will be required to install and maintain a vegetated wall to cover that portion of the proposed easterly building façade that is exposed. Such vegetated wall will need to be included in the facility/property operations and maintenance plan to ensure ongoing success.

21) Prior to any construction work or planting on 29 Saratoga, the Applicant shall provide copy of a formal binding agreement for installation and long-term maintenance for all proposed landscaping plantings.

22) Prior to commencement of any blasting operations, the Applicant shall obtain the necessary permits from the Devens Fire Department and comply with MGL 148 and 527 CMR requirements. Prior to issuance of a Certificate of Occupancy, all blasted ledge areas shall be stabilized to ensure there are no loose rock areas that could create hazards.

23) All outstanding peer review fees shall be paid prior to issuance of a building permit.

24) The applicant shall update soils data and stormwater calculations to resolve outstanding DEC peer review comments and ensure stormwater management modeling for the site, along with the steep grades, and vegetation treatments at the property boundaries, comply with the Stormwater Management Standards, 974 CMR 4.08 - ensuring the project is not directing excess runoff onto adjacent properties.

25) A complete revised Traffic Report shall be submitted that addresses all Nitsch comments through August 26, 2022.

9. **Decision:**
The Public Hearing closed on October 25, 2022 and the DEC voted on October 25, 2022, to grant the requested waivers, issue findings, including that the application complied with Approval Criteria in 974 CMR 3.03(2), to impose conditions, and to approve the Site Plan for the construction of a +/-154,000 sq.ft. new industrial building, with associated grading, landscaping, parking, stormwater, and utility improvements at 35 Saratoga Boulevard, Devens (Harvard), MA.

10. **Building Permit:**
The Building Commissioner, along with the Electrical and Plumbing Inspectors, must review architectural/structural drawings and specifications and approve them in writing, prior to issuance of a building permit. All requirements in the Massachusetts Building Code, the Massachusetts Sanitary Code, and the Devens Fire Chief must be met. When this approval is obtained, the building permit may then be integrated with this Record of Decision; together they will constitute the Unified Permit for this project and in turn, allow construction to commence.

11. **Permit Duration:**
In accordance with 974 CMR 1.10, unified permits shall remain in effect so long as the approved activities are commenced within six months of the date of the DEC or the LUA produces a written decision and approved activities are completed within two years. It is further noted that there is a thirty-day "reconsideration period" during which an applicant, a Town, or an aggrieved person may request the DEC reconsider its action (By-Laws, Article IV, Sections C through F). Work performed during this period, which begins on October 26, 2022 and terminates November 26, 2022, is "at risk". Final plans must be submitted to the Commission for endorsement by April 25, 2023.

Approved by:

10·26·2022
Date

Peter C. Lowitt, FAICP, Director
Devens Enterprise Commission

Certification ***Middlesex, SS***

I certify the above is a true action and record of the Devens Enterprise Commission and that Peter C. Lowitt, Devens Land Use Administrator/Director, is empowered by the Devens Enterprise Commission to sign this Record of Decision on its behalf.

10/26/2022
Date

Dawn Babcock, Notary
My Commission expires 3·2·2029

DAWN M BABCOCK
Notary Public
Commonwealth of Massachusetts
My Commission Expires
March 2, 2029

ITE TRIP GENERATION WORKSHEET
(12th Edition, Updated 2025)

LANDUSE: Research & Development Center
LANDUSE CODE: 760
SETTING/LOCATION: General Urban/Suburban
JOB NAME: **Devens CFS-3**
JOB NUMBER: **14867**

Trip Type --- Vehicle
Independent Variable --- 1,000 Sq. Feet Gross Floor Area

FLOOR AREA (KSF): 154

WEEKDAY

RATES:

	# Studies	R^2	Total Trip Ends			Independent Variable Range			Directional Distribution	
			Average	Low	High	Average	Low	High	Enter	Exit
DAILY	1	NA	9.47	9.47	9.47	42	42	42	50%	50%
AM PEAK (ADJACENT ST)	13	NA	0.48	0.17	2.19	123	10	331	78%	22%
PM PEAK (ADJACENT ST)	13	NA	0.45	0.13	1.40	123	10	331	25%	75%

TRIPS:

	BY AVERAGE			BY REGRESSION		
	Total	Enter	Exit	Total	Enter	Exit
DAILY	1,458	729	729	NA	NA	NA
AM PEAK (ADJACENT ST)	74	58	16	NA	NA	NA
PM PEAK (ADJACENT ST)	69	17	52	NA	NA	NA

TRAFFIC GROWTH CALCULATIONS - 35 SARATOGA BOULEVARD

Notes: estimating TD and TG based on ITE
ITE LUC 760 R&D

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

35 Saratoga Boulevard
15400 sf industrial
under construction
https://devensec.com/meetings/ROD_35_Saratoga_Blvd.pdf

INTERSECTION		MOVEMENT	NEW TRIPS ENTER	NEW TRIPS EXIT	AM PEAK HOUR TRIPS ENTER	AM PEAK HOUR TRIPS EXIT	AM PEAK HOUR TRIPS TOTAL	PM PEAK HOUR TRIPS ENTER	PM PEAK HOUR TRIPS EXIT	PM PEAK HOUR TRIPS TOTAL
1. JACKSON ROAD AT PATTON ROAD/LAKE GEORGE STREET										
Lake George Street		EB L			0	0	0	0	0	0
		EB T			0	0	0	0	0	0
		EB R			0	0	0	0	0	0
Patton Road		WB L			0	0	0	0	0	0
		WB T			0	0	0	0	0	0
		WB R			0	0	0	0	0	0
Jackson Road		NB U			0	0	0	0	0	0
		NB L			0	0	0	0	0	0
		NB T	77%		45	0	45	13	0	13
		NB R			0	0	0	0	0	0
Jackson Road		SB L			0	0	0	0	0	0
		SB T		77%	0	12	12	0	40	40
		SB R			0	0	0	0	0	0
		SUM			0	0	0	0	0	0
2. JACKSON ROAD AT GIVRY STREET										
Jackson Road	NB in new counts	NEB L			0	0	0	0	0	0
		NEB T	77%		45	0	45	13	0	13
		NEB R			0	0	0	0	0	0
Jackson Road	SB in new counts	SWB L			0	0	0	0	0	0
		SWB T		77%	0	12	12	0	40	40
		SWB R			0	0	0	0	0	0
Givry Street	WB in new counts	NWB U			0	0	0	0	0	0
		NWB L			0	0	0	0	0	0
		NWB T			0	0	0	0	0	0
		NWB R			0	0	0	0	0	0
Givry Street	EB in new counts	SEB L			0	0	0	0	0	0
		SEB T			0	0	0	0	0	0
		SEB R			0	0	0	0	0	0
		SUM								
3. JACKSON ROAD AT PINE ROAD										
Jackson Road		EB L			0	0	0	0	0	0
		EB T	77%		45	0	45	13	0	13
Jackson Road		WB T		77%	0	12	12	0	40	40
		WB R			0	0	0	0	0	0
Pine Road		SB L			0	0	0	0	0	0
		SB R			0	0	0	0	0	0
		SUM								
4. HOSPITAL ROAD AT WESTERLY SITE DRIVEWAY										
Hospital Road		EB L			0	0	0	0	0	0
		EB T	5%		3	0	3	1	0	1
		EB R			0	0	0	0	0	0
Hospital Road		WB U			0	0	0	0	0	0
		WB L			0	0	0	0	0	0
		WB T		5%	0	1	1	0	3	3
		WB R			0	0	0	0	0	0
NE Studios Driveway		NB L			0	0	0	0	0	0
		NB T			0	0	0	0	0	0
		NB R			0	0	0	0	0	0
Westerly Site Driveway (Spruce Street)		SB L			0	0	0	0	0	0
		SB T			0	0	0	0	0	0
		SB R			0	0	0	0	0	0
		SUM								

TRAFFIC GROWTH CALCULATIONS - 35 SARATOGA BOULEVARD

Notes: estimating TD and TG based on ITE
ITE LUC 760 R&D

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

35 Saratoga Boulevard
15400 sf industrial
under construction
https://devensec.com/meetings/ROD_35_Saratoga_Blvd.pdf

INTERSECTION	MOVEMENT	NEW TRIPS		AM PEAK HOUR TRIPS			PM PEAK HOUR TRIPS		
		ENTER	EXIT	ENTER	EXIT	TOTAL	ENTER	EXIT	TOTAL
5T. HOSPITAL ROAD AT GIVRY STREET WEST									
Hospital Road	EB T	5%		3	0	3	1	0	1
	EB R			0	0	0	0	0	0
	WB T		5%	0	1	1	0	3	3
Hospital Road	NWB L			0	0	0	0	0	0
5. HOSPITAL ROAD AT GIVRY STREET WEST - WHOLE TRIANGLE									
Hospital Road	EB T	5%		3	0	3	1	0	1
	EB R			0	0	0	0	0	0
Hospital Road	WB L			0	0	0	0	0	0
	WB T		5%	0	1	1	0	3	3
Givry Street	NWB BR L			0	0	0	0	0	0
Givry Street	NWB BR			0	0	0	0	0	0
	SUM								
6. GIVRY STREET SPLIT									
Givry Street	NB T			0	0	0	0	0	0
	NB R			0	0	0	0	0	0
	SB L			0	0	0	0	0	0
Givry Street	SB T			0	0	0	0	0	0
Givry Street	SWB L			0	0	0	0	0	0
	SWB R			0	0	0	0	0	0
	SUM								
7. HOSPITAL ROAD AT GIVRY STREET EAST									
Hospital Road	EB T	5%		3	0	3	1	0	1
Hospital Road	WB L			0	0	0	0	0	0
	WB T		5%	0	1	1	0	3	3
Givry Street	NEB BR			0	0	0	0	0	0
	SUM								
8. HOSPITAL ROAD AT EASTERLY SITE DRIVEWAY (HOSPITAL LANE)									
Hospital Road	EB L			0	0	0	0	0	0
	EB T	5%		3	0	3	1	0	1
Hospital Road	WB T		5%	0	1	1	0	3	3
	WB R			0	0	0	0	0	0
Easterly Site Driveway (Hospital Lane)	SB L			0	0	0	0	0	0
	SB R			0	0	0	0	0	0
	SUM								
9. GRANT ROAD AT HOSPITAL ROAD									
Hospital Road	EB L	5%		3	0	3	1	0	1
	EB R			0	0	0	0	0	0
Grant Road	NB L			0	0	0	0	0	0
	NB T			0	0	0	0	0	0
Grant Road	SB T			0	0	0	0	0	0
	SB R		5%	0	1	1	0	3	3
	SUM								
10. GRANT ROAD AT PINE ROAD									
Pine Road	WB L			0	0	0	0	0	0
	WB R			0	0	0	0	0	0
Grant Road	NB U			0	0	0	0	0	0
	NB T			0	0	0	0	0	0
	NB R	5%		3	0	3	1	0	1
Grant Road	SB L		5%	0	1	1	0	3	3
	SB T			0	0	0	0	0	0
	SUM			0	0	0	0	0	0

TRAFFIC GROWTH CALCULATIONS - 35 SARATOGA BOULEVARD

Notes: estimating TD and TG based on ITE
ITE LUC 760 R&D

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

35 Saratoga Boulevard
15400 sf industrial
under construction
https://devensec.com/meetings/ROD_35_Saratoga_Blvd.pdf

INTERSECTION	MOVEMENT	NEW TRIPS ENTER	NEW TRIPS EXIT	AM PEAK HOUR TRIPS ENTER	AM PEAK HOUR TRIPS EXIT	AM PEAK HOUR TRIPS TOTAL	PM PEAK HOUR TRIPS ENTER	PM PEAK HOUR TRIPS EXIT	PM PEAK HOUR TRIPS TOTAL
11. FRONT STREET AT HOSPITAL ROAD									
Front Street	EB T			0	0	0	0	0	0
	EB R	5%		3	0	3	1	0	1
Front Street	WB L			0	0	0	0	0	0
	WB T			0	0	0	0	0	0
Hospital Road	NB L		5%	0	1	1	0	3	3
	NB R			0	0	0	0	0	0
	SUM								
			TRIP GEN	58	16	74	17	52	69

Staff Report

Devens Enterprise Commission

Date: August 29, 2022

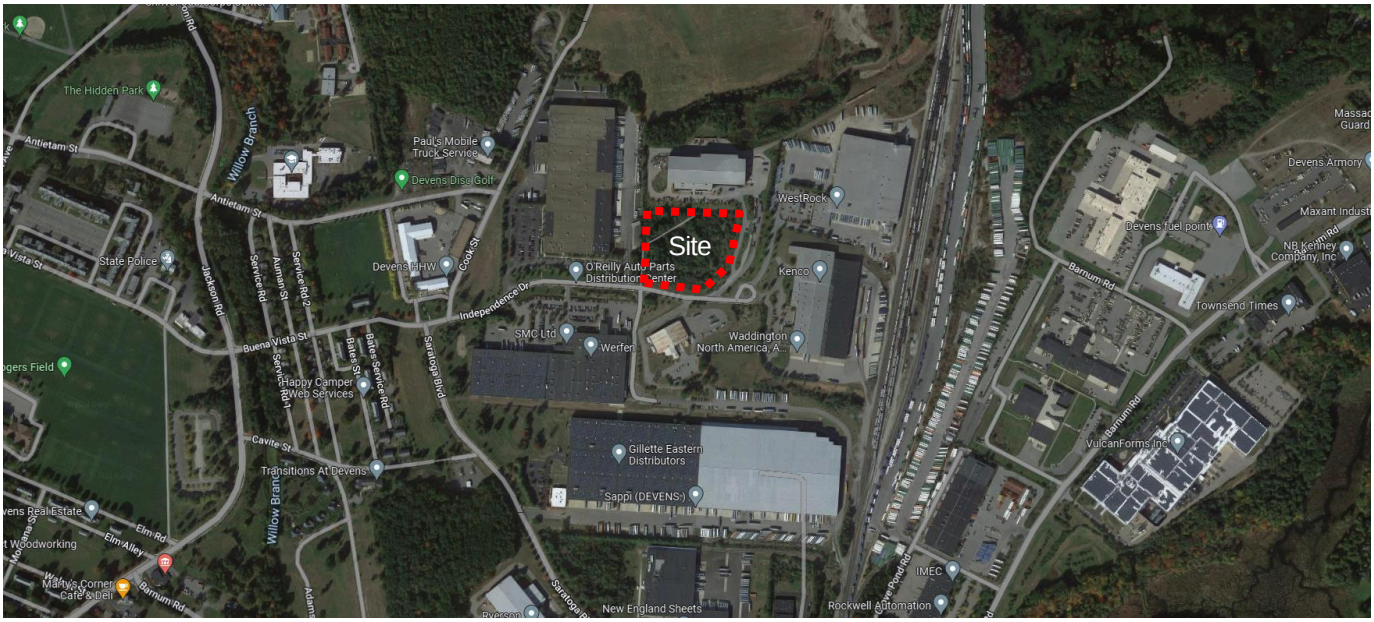
To: **Devens Enterprise Commission**

From: Peter Lowitt, Director/Land Use Administrator & Neil Angus, Environmental Planner

RE: **Level 2 Unified Permit 31 Independence Drive – Unified Permit–Review Staff Report**

Owner/App.: 31 Independence Drive, LLC. Property Owner
Engineer: Eugene T. Sullivan, Inc.
Location: 31 Independence Drive, Devens MA. (Parcel ID#26-13-1800)
Zoning: Rail, Industrial, and Trade Related Uses District, & Aquifer and Zone 2 Water Resources Protection Overlay Districts.

Premises and Proposed Project: The Applicant has submitted a Level 2 Unified Permit application for the proposed development of a +/-111,050 sq.ft. new industrial building, with associated grading, landscaping, parking, stormwater, and utility improvements. The proposed tenant is unknown at this time. This new development would be accessed via Independence Drive.



Site Issues at a Glance:

Zoning:

Rail, Industrial and Trade Related (RIT) Uses include industrial and light industrial warehousing, distribution and manufacturing uses associated with rail and/or multi-modal distribution. A condition of approval would be that the tenant be determined an allowed use within the district. This facility will be used for warehousing, distribution and office support which is consistent with the goals of the Rail Industrial and Trade Related District. The Applicant needs to provide a description of the proposed development, including type of business, type of operation, process or activities and other information needed to clarify what will happen on the site once developed.

Setbacks:
The property has 25' front and rear setbacks and two sides (10' setbacks). The applicant is seeking a waiver to allow parking and loading docks in front of the building without the required 60 landscape buffer required in the RIT district. 974 CMR 3.03 (a) (1).

Access:
The Applicant is utilizing an access drive off of Independence Drive. A separate fire access drive is proposed to provide access to the north and west sides of the property. The required third means of access is from the front parking area. The Applicant has sought an easement from their neighbor, Republic to allow emergency access or egress to the rear of the property. This has not been granted. Our counsel spoke with GFI Partners (31 Independence LLC) counsel and suggested that the fire access drive be continued around the entire facility. Another option would be to locate a hammerhead turnaround capable of allowing a fire truck to turn around in the northeast corner of the building. Both options would result in a reduced building size more in compliance with our Regulations. The submitted plans show access from the abutter. Our counsel has opined that" generally, one cannot do work, such as creating a fire lane, on the property of another without clear evidence of a right to do such as an easement. "

Parking:
The Applicant is proposing 63 parking spaces for this project. There is 6400 square feet of Business Office Use and 104,600 sf of manufacturing and industrial uses which would create a parking maximum of 215 spaces. The Applicant is requesting that the DEC make a finding that the spaces proposed are sufficient for the proposed use. The RIT district allows parking and loading docks in the front of the building if a 60' landscaped buffer is provided, and the building is more than 150' from the road right of way. Only 15'+/- of buffer is provided without the required planting of 60' of landscaped buffer. Most of this area is proposed to be used for snow storage, not landscaped buffer.

Traffic:
Based upon the ITE Trip Generation Manual (10th Edition), this site would be expected to generate approximately 16 trips during the peak hour for the office personnel (2.54 trips be 1,000gsf) and 70 trips during the peak hour for manufacturing areas (.67 trips per 1000 GSF). Based upon similar projects of this type, the Applicant expects about 60 employees. The existing Devens street network has sufficient capacity to accommodate this increase. To help reduce single occupancy vehicle use and parking, the Applicant and its future tenant through a condition of approval, should commit to become members of the Devens Transportation Management Association [TMA] and to implement the following traffic mitigation measures:

- Encourage the use of bicycles by providing and maintaining bicycle parking areas
- Encourage the use of Electric vehicles by providing the required spaces;
- Encourage and ensure the use of public transportation opportunities utilizing high occupancy vehicles [HOV]
- Preferential carpool/vanpool parking spaces have been provided near the main building entrance.

In accordance with 974 CMR 3.04(3)(a)10., additional traffic mitigation measures the Applicant should consider include:

- Providing ride-matching services;
- Providing flexible work schedules;
- Guaranteed ride home program and incentives for using public transit.

Provide ADT for the record.

Greenhouse Gas Emissions:
As this project is currently proposing less than 300 parking spaces, the building would not need to be built to meet the MA Stretch Energy Code as required by 974 CMR 4.11. The Applicant's future tenant will join the Devens Eco-Efficiency Center and demonstrate compliance with EcoStar Standard 24- Climate Change Mitigation. Applicant to provide information on how they will comply with applicable climate mitigation requirements.

Urban Heat Island: The roof should be either a white roof or a vegetated roof and facilities maintenance plans updated to address their care and upkeep.

Utilities:
There is adequate capacity in all utilities to service the anticipated needs of this project. Devens Utilities has reviewed the proposed project and provided a number of comments regarding water, sewer, gas and electrical communications that will need to be resolved as part of any plan revisions. There is an 8" PVC sewer line running along the westerly side of the property under the proposed fire access easement area. There is a 4" gas line running along the Republic property line as well.

Public Safety:
There are two hydrants proposed on the property. The Applicant will need to provide a letter from the Fire Department confirming that all safety issues have been addressed.

Devens Industrial Performance Standard (IPS) Requirements:
Noise: The proposed facility will need to comply with the DEC Industrial Performance Standards for noise. Depending on the proposed building and operations, a sound study may be required.

Lighting: There are a few spots where lights levels go up to 6.2 and 7.3 fc. There is a careful balance between too much light and not enough. The Applicant should ensure there is a minimum of 0.5 fc consistently across the site, with no areas above 2.0-2.5 fc. Lights should be properly directed and shielded to avoid any spillover onto adjacent properties.

Stormwater Management: The Applicant is proposing to use porous pavement for the areas near each of the two offices. A large underground vault located under the parking lot will be used to treat and store stormwater runoff. The DEC's Peer Review Engineers, in their letter of 8/9/22, have reviewed the proposed design and have requested a number of modifications and additional details from the Applicant to confirm that the proposed design complies fully with the MA DEP Stormwater Management Standards, DEC Rules and Regulations, and MS4 permitting requirements. A long-term stormwater pollution prevention plan has been included as part of the submittal. Construction stormwater pollution prevention plan details are included on the erosion and sediment control plan sheet however, the applicant is disturbing greater than one acre, they will need to file an EPA NPDES Construction General Permit. A copy of this permit will need to be provided to the DEC as well prior to commencement of construction.

Landscaping: Applicant is requesting waiver from 974CMR304(3)(a)1 to allow parking in front of building. This is allowed in the RIT zone, but the required 60' front landscaped area required is not provided. A waiver from 974CMR 304(8)(h) perimeter parking lot landscaping along the southerly property is being sought as well. Applicant should note that the perimeter landscaping is deficient along all property boundaries. The fire access runs around the perimeter of the property, leaving no room along the property perimeter to provide the required screening and plantings. There is a required 15' setback between the fire access road and the building. There might be opportunities to install plantings in this area.

The Applicant included an Operations and Maintenance which includes a Landscape Maintenance and Water Management Plan, Invasive species control plan and pollution prevention plan. The application of 100% salt for de-icing should also be prohibited in this plan to comply with the Zone 2 requirements.

Design Approval: MassDevelopment Design Approval letter has not been submitted and would become a condition of approval.

Proposed Waiver Requests: The Applicant has requested the following waivers:

974 CMR 3.04 (3)(a) (1) - waiver for loading docks and parking in front of the building without the required 60' of landscaping in front of the building.

974 CMR 3.04(8)(h). requires perimeter screening and parking lot plantings. One tree per 25 lineal feet of parking perimeter plus one tree per 50 feet in areas where screening is required and a half screen along the rear and sides of the property.

Waiver Request Narrative from Applicant:

"*We are requesting a waiver from 974 CMR 3.03 (a) (1) to allow loading and parking in the front of the building. We are requesting a waiver from the parking lot planting requirements under 974 CMR 3.04 (8) (h) along the parking area on the south property line adjacent to Independence Drive."*

The Applicant's submittal does not contain any reasoning or justification for these waiver requests. 974 CMR 3.04(6(a)5. requires loading docks be located on the side or rear of the building. Parking and loading docks in the front of the building have been allowed in the past with the required setback and screening but this project does not have the 60' landscape area or any of the required screening in front of the building. If the landscaping area and screening can be added, Staff would recommend granting the first waiver request. However, the Applicant would also need to request a waiver from 974 CMR 3.04(6(a)5. for the loading docks in front. There are numerous other deficiencies in the landscape plans, the perimeter fire access drive and its interplay with our landscaping requirements is a major issue.

Process: The application was submitted on July 12, 2022 and the Determination of Completeness was issued on July 18, 2022. Copies of the application were received by the surrounding Towns on July 20, 2022. Legal notices were placed in Nashoba Publications on August 5 and 12, 2022, 2022. All abutting property owners were duly notified by certified mail. The 30-day Town comment period expired on August 22, 2022. No public comments were received. The 75 day review period for the DEC to act on this application ends on October 1, 2022. The Commission opened the hearing on August 30, 2022.

Comments and Recommendations: The proposed use will require review prior to any occupancy but as long as it is consistent with the development goals of the Rail, Industrial and Trade Related Uses District, it will be allowed. As presented, the site plan contains a number of deficiencies that do not comply with the DEC Rules and Regulations. Access and perimeter landscaping and screening remain the focus of our review. A smaller structure might allow compliance with all regulations. Staff has relayed these issues to the Applicant.

Once the Applicant has presented the project and all questions from the Commission and public have been heard, staff would recommend the Commission continue the public hearing to 6:45PM on September 27, 2022 to allow the applicant additional time to revise the plans to sufficiently address the issues raised.

Attachments:

1. All Site Plan and supporting application information is available at: https://www.devensec.com/level2hearingsAugust30.html

ITE TRIP GENERATION WORKSHEET
(12th Edition, Updated 2025)

LANDUSE: Research & Development Center
LANDUSE CODE: 760
SETTING/LOCATION: General Urban/Suburban
JOB NAME: **Devens CFS-3**
JOB NUMBER: **14867**

Trip Type --- Vehicle
Independent Variable --- 1,000 Sq. Feet Gross Floor Area

FLOOR AREA (KSF): 111

WEEKDAY

RATES:

	# Studies	R^2	Total Trip Ends			Independent Variable Range			Directional Distribution	
			Average	Low	High	Average	Low	High	Enter	Exit
DAILY	1	NA	9.47	9.47	9.47	42	42	42	50%	50%
AM PEAK (ADJACENT ST)	13	NA	0.48	0.17	2.19	123	10	331	78%	22%
PM PEAK (ADJACENT ST)	13	NA	0.45	0.13	1.40	123	10	331	25%	75%

TRIPS:

	BY AVERAGE			BY REGRESSION		
	Total	Enter	Exit	Total	Enter	Exit
DAILY	1,051	526	526	NA	NA	NA
AM PEAK (ADJACENT ST)	53	42	12	NA	NA	NA
PM PEAK (ADJACENT ST)	50	12	37	NA	NA	NA

TRAFFIC GROWTH CALCULATIONS - 31 INDEPENDENCE DRIVE

Notes: estimating TD and TG based on ITE
ITE LUC 760 R&D

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

31 Independence Road
111050 sf R&D
under construction
Interoffice Memo

INTERSECTION		MOVEMENT	NEW TRIPS ENTER	NEW TRIPS EXIT	AM PEAK HOUR TRIPS ENTER	AM PEAK HOUR TRIPS EXIT	AM PEAK HOUR TRIPS TOTAL	PM PEAK HOUR TRIPS ENTER	PM PEAK HOUR TRIPS EXIT	PM PEAK HOUR TRIPS TOTAL
1. JACKSON ROAD AT PATTON ROAD/LAKE GEORGE STREET										
Lake George Street		EB L			0	0	0	0	0	0
		EB T			0	0	0	0	0	0
		EB R			0	0	0	0	0	0
Patton Road		WB L			0	0	0	0	0	0
		WB T			0	0	0	0	0	0
		WB R			0	0	0	0	0	0
Jackson Road		NB U			0	0	0	0	0	0
		NB L			0	0	0	0	0	0
		NB T	40%		17	0	17	5	0	5
		NB R			0	0	0	0	0	0
Jackson Road		SB L			0	0	0	0	0	0
		SB T		40%	0	5	5	0	15	15
		SB R			0	0	0	0	0	0
		SUM			0	0	0	0	0	0
2. JACKSON ROAD AT GIVRY STREET										
Jackson Road	NB in new counts	NEB L			0	0	0	0	0	0
		NEB T	40%		17	0	17	5	0	5
		NEB R			0	0	0	0	0	0
Jackson Road	SB in new counts	SWB L			0	0	0	0	0	0
		SWB T		40%	0	5	5	0	15	15
		SWB R			0	0	0	0	0	0
Givry Street	WB in new counts	NWB U			0	0	0	0	0	0
		NWB L			0	0	0	0	0	0
		NWB T			0	0	0	0	0	0
		NWB R			0	0	0	0	0	0
Givry Street	EB in new counts	SEB L			0	0	0	0	0	0
		SEB T			0	0	0	0	0	0
		SEB R			0	0	0	0	0	0
		SUM								
3. JACKSON ROAD AT PINE ROAD										
Jackson Road		EB L			0	0	0	0	0	0
		EB T	40%		17	0	17	5	0	5
Jackson Road		WB T			0	0	0	0	0	0
		WB R		40%	0	5	5	0	15	15
Pine Road		SB L			0	0	0	0	0	0
		SB R			0	0	0	0	0	0
		SUM								
4. HOSPITAL ROAD AT WESTERLY SITE DRIVEWAY										
Hospital Road		EB L			0	0	0	0	0	0
		EB T			0	0	0	0	0	0
		EB R			0	0	0	0	0	0
Hospital Road		WB U			0	0	0	0	0	0
		WB L			0	0	0	0	0	0
		WB T			0	0	0	0	0	0
		WB R			0	0	0	0	0	0
NE Studios Driveway		NB L			0	0	0	0	0	0
		NB T			0	0	0	0	0	0
		NB R			0	0	0	0	0	0
Westerly Site Driveway (Spruce Street)		SB L			0	0	0	0	0	0
		SB T			0	0	0	0	0	0
		SB R			0	0	0	0	0	0
		SUM								

TRAFFIC GROWTH CALCULATIONS - 31 INDEPENDENCE DRIVE

Notes: estimating TD and TG based on ITE
ITE LUC 760 R&D

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

31 Independence Road
111050 sf R&D
under construction
Interoffice Memo

INTERSECTION	MOVEMENT	NEW TRIPS		AM PEAK HOUR TRIPS			PM PEAK HOUR TRIPS		
		ENTER	EXIT	ENTER	EXIT	TOTAL	ENTER	EXIT	TOTAL
5T. HOSPITAL ROAD AT GIVRY STREET WEST									
Hospital Road	EB T			0	0	0	0	0	0
	EB R			0	0	0	0	0	0
	WB T			0	0	0	0	0	0
Hospital Road	NWB L			0	0	0	0	0	0
5. HOSPITAL ROAD AT GIVRY STREET WEST - WHOLE TRIANGLE									
Hospital Road	EB T			0	0	0	0	0	0
	EB R			0	0	0	0	0	0
Hospital Road	WB L			0	0	0	0	0	0
	WB T			0	0	0	0	0	0
Givry Street	NWB BR L			0	0	0	0	0	0
Givry Street	NWB BR			0	0	0	0	0	0
	SUM								
6. GIVRY STREET SPLIT									
Givry Street	NB T			0	0	0	0	0	0
	NB R			0	0	0	0	0	0
	SB L			0	0	0	0	0	0
Givry Street	SB T			0	0	0	0	0	0
Givry Street	SWB L			0	0	0	0	0	0
	SWB R			0	0	0	0	0	0
	SUM								
7. HOSPITAL ROAD AT GIVRY STREET EAST									
Hospital Road	EB T			0	0	0	0	0	0
Hospital Road	WB L			0	0	0	0	0	0
	WB T			0	0	0	0	0	0
Givry Street	NEB BR			0	0	0	0	0	0
	SUM								
8. HOSPITAL ROAD AT EASTERLY SITE DRIVEWAY (HOSPITAL LANE)									
Hospital Road	EB L			0	0	0	0	0	0
	EB T			0	0	0	0	0	0
Hospital Road	WB T			0	0	0	0	0	0
	WB R			0	0	0	0	0	0
Easterly Site Driveway (Hospital Lane)	SB L			0	0	0	0	0	0
	SB R			0	0	0	0	0	0
	SUM								
9. GRANT ROAD AT HOSPITAL ROAD									
Hospital Road	EB L			0	0	0	0	0	0
	EB R			0	0	0	0	0	0
Grant Road	NB L			0	0	0	0	0	0
	NB T			0	0	0	0	0	0
Grant Road	SB T			0	0	0	0	0	0
	SB R			0	0	0	0	0	0
	SUM								
10. GRANT ROAD AT PINE ROAD									
Pine Road	WB L			0	0	0	0	0	0
	WB R			0	0	0	0	0	0
Grant Road	NB U			0	0	0	0	0	0
	NB T			0	0	0	0	0	0
	NB R			0	0	0	0	0	0
Grant Road	SB L			0	0	0	0	0	0
	SB T			0	0	0	0	0	0
	SUM			0	0	0	0	0	0

TRAFFIC GROWTH CALCULATIONS - 31 INDEPENDENCE DRIVE

Notes: estimating TD and TG based on ITE
ITE LUC 760 R&D

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

31 Independence Road
111050 sf R&D
under construction
Interoffice Memo

INTERSECTION	MOVEMENT	NEW TRIPS ENTER	NEW TRIPS EXIT	AM PEAK HOUR TRIPS ENTER	AM PEAK HOUR TRIPS EXIT	AM PEAK HOUR TRIPS TOTAL	PM PEAK HOUR TRIPS ENTER	PM PEAK HOUR TRIPS EXIT	PM PEAK HOUR TRIPS TOTAL
11. FRONT STREET AT HOSPITAL ROAD									
Front Street	EB T			0	0	0	0	0	0
	EB R			0	0	0	0	0	0
Front Street	WB L			0	0	0	0	0	0
	WB T			0	0	0	0	0	0
Hospital Road	NB L			0	0	0	0	0	0
	NB R			0	0	0	0	0	0
	SUM								
			TRIP GEN	42	12	54	12	37	49

ITE TRIP GENERATION WORKSHEET
(12th Edition)

LANDUSE: Single-Family Detached Housing
LANDUSE CODE: 210
SETTING/LOCATION: General Urban / Suburban
JOB NAME:
JOB NUMBER:

Independent Variable --- Number of Dwelling Units

18 dwelling units

WEEKDAY

RATES:

	# Studies	R^2	Total Trip Ends: Average	Low	High	Independent Variable Range: Average	Low	High	Directional Distribution: Enter	Exit
DAILY	155	0.94	9.09	3.47	23.80	261	10	2,945	50%	50%
AM PEAK OF GENERATOR	132	0.90	0.75	0.32	2.27	232	10	2,945	27%	73%
PM PEAK OF GENERATOR	138	0.91	0.97	0.49	2.98	214	10	1,781	63%	37%
AM PEAK (ADJACENT ST)	153	0.89	0.70	0.22	2.27	239	5	2,945	27%	73%
PM PEAK (ADJACENT ST)	166	0.90	0.93	0.35	2.98	266	10	2,945	62%	38%

TRIPS:

	BY AVERAGE: Total	Enter	Exit	BY REGRESSION: Total	Enter	Exit
DAILY	164	82	82	410	205	205
AM PEAK OF GENERATOR	14	4	10	22	6	16
PM PEAK OF GENERATOR	17	11	6	22	14	8
AM PEAK (ADJACENT ST)	13	3	9	18	5	13
PM PEAK (ADJACENT ST)	17	10	6	20	12	8

SATURDAY

RATES:

	# Studies	R^2	Total Trip Ends: Average	Low	High	Independent Variable Range: Average	Low	High	Directional Distribution: Enter	Exit
DAILY	42	0.92	9.03	3.36	28.90	159	10	1,000	50%	50%
PEAK OF GENERATOR	33	0.89	1.00	0.41	2.90	106	10	644	53%	47%

TRIPS:

	BY AVERAGE: Total	Enter	Exit	BY REGRESSION: Total	Enter	Exit
DAILY	162	81	81	282	141	141
PEAK OF GENERATOR	18	10	8	27	14	13

SUNDAY

RATES:

	# Studies	R^2	Total Trip Ends: Average	Low	High	Independent Variable Range: Average	Low	High	Directional Distribution: Enter	Exit
DAILY	38	0.96	8.43	2.61	16.44	172	15	1,000	50%	50%
PEAK OF GENERATOR	26	0.95	0.91	0.36	2.15	130	13	644	53%	47%

TRIPS:

	BY AVERAGE: Total	Enter	Exit	BY REGRESSION: Total	Enter	Exit
DAILY	152	76	76	96	48	48
PEAK OF GENERATOR	16	9	8	22	12	10

TRAFFIC GROWTH CALCULATIONS - GODDARD STREET RESI

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

Goddard Street Resi
18 units
under construction

Notes: estimating TD and TG based on ITE
ITE LUC 210 Single-Family Detached
used distribution from emerson green - from the 2020 version of the cfs project, used single family for highest trip gen

INTERSECTION		MOVEMENT	NEW TRIPS ENTER	NEW TRIPS EXIT	AM PEAK HOUR TRIPS ENTER	AM PEAK HOUR TRIPS EXIT	AM PEAK HOUR TRIPS TOTAL	PM PEAK HOUR TRIPS ENTER	PM PEAK HOUR TRIPS EXIT	PM PEAK HOUR TRIPS TOTAL
1. JACKSON ROAD AT PATTON ROAD/LAKE GEORGE STREET										
Lake George Street		EB L			0	0	0	0	0	0
		EB T			0	0	0	0	0	0
		EB R			0	0	0	0	0	0
Patton Road		WB L			0	0	0	0	0	0
		WB T			0	0	0	0	0	0
		WB R			0	0	0	0	0	0
Jackson Road		NB U			0	0	0	0	0	0
		NB L			0	0	0	0	0	0
		NB T	77%		4	0	4	9	0	9
		NB R			0	0	0	0	0	0
Jackson Road		SB L			0	0	0	0	0	0
		SB T		77%	0	10	10	0	6	6
		SB R			0	0	0	0	0	0
		SUM			0	0	0	0	0	0
2. JACKSON ROAD AT GIVRY STREET										
Jackson Road	NB in new counts	NEB L			0	0	0	0	0	0
		NEB T	77%		4	0	4	9	0	9
		NEB R			0	0	0	0	0	0
Jackson Road	SB in new counts	SWB L			0	0	0	0	0	0
		SWB T		77%	0	10	10	0	6	6
		SWB R			0	0	0	0	0	0
Givry Street	WB in new counts	NWB U			0	0	0	0	0	0
		NWB L			0	0	0	0	0	0
		NWB T			0	0	0	0	0	0
		NWB R			0	0	0	0	0	0
Givry Street	EB in new counts	SEB L			0	0	0	0	0	0
		SEB T			0	0	0	0	0	0
		SEB R			0	0	0	0	0	0
		SUM								
3. JACKSON ROAD AT PINE ROAD										
Jackson Road		EB L			0	0	0	0	0	0
		EB T			0	0	0	0	0	0
Jackson Road		WB T			0	0	0	0	0	0
		WB R	7%		0	0	0	1	0	1
Pine Road		SB L		7%	0	1	1	0	1	1
		SB R			0	0	0	0	0	0
		SUM								
4. HOSPITAL ROAD AT WESTERLY SITE DRIVEWAY										
Hospital Road		EB L			0	0	0	0	0	0
		EB T	5%		0	0	0	1	0	1
		EB R			0	0	0	0	0	0
Hospital Road		WB U			0	0	0	0	0	0
		WB L			0	0	0	0	0	0
		WB T		5%	0	1	1	0	0	0
		WB R			0	0	0	0	0	0
NE Studios Driveway		NB L			0	0	0	0	0	0
		NB T			0	0	0	0	0	0
		NB R			0	0	0	0	0	0
Westerly Site Driveway (Spruce Street)		SB L			0	0	0	0	0	0
		SB T			0	0	0	0	0	0
		SB R			0	0	0	0	0	0
		SUM								

TRAFFIC GROWTH CALCULATIONS - GODDARD STREET RESI

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

Goddard Street Resi
18 units
under construction

Notes: estimating TD and TG based on ITE
ITE LUC 210 Single-Family Detached
used distribution from emerson green - from the 2020 version of the cfs project, used single family for highest trip gen

INTERSECTION	MOVEMENT	NEW TRIPS ENTER	NEW TRIPS EXIT	AM PEAK HOUR TRIPS ENTER	AM PEAK HOUR TRIPS EXIT	AM PEAK HOUR TRIPS TOTAL	PM PEAK HOUR TRIPS ENTER	PM PEAK HOUR TRIPS EXIT	PM PEAK HOUR TRIPS TOTAL
5T. HOSPITAL ROAD AT GIVRY STREET WEST									
Hospital Road	EB T	5%		0	0	0	1	0	1
	EB R			0	0	0	0	0	0
	WB T		5%	0	1	1	0	0	0
Hospital Road	NWB L			0	0	0	0	0	0
5. HOSPITAL ROAD AT GIVRY STREET WEST - WHOLE TRIANGLE									
Hospital Road	EB T	5%		0	0	0	1	0	1
	EB R			0	0	0	0	0	0
Hospital Road	WB L			0	0	0	0	0	0
	WB T		5%	0	1	1	0	0	0
Givry Street	NWB BR L			0	0	0	0	0	0
Givry Street	NWB BR			0	0	0	0	0	0
	SUM								
6. GIVRY STREET SPLIT									
Givry Street	NB T			0	0	0	0	0	0
	NB R			0	0	0	0	0	0
	SB L			0	0	0	0	0	0
Givry Street	SB T			0	0	0	0	0	0
Givry Street	SWB L			0	0	0	0	0	0
	SWB R			0	0	0	0	0	0
	SUM								
7. HOSPITAL ROAD AT GIVRY STREET EAST									
Hospital Road	EB T	5%		0	0	0	1	0	1
Hospital Road	WB L			0	0	0	0	0	0
	WB T		5%	0	1	1	0	0	0
Givry Street	NEB BR			0	0	0	0	0	0
	SUM								
8. HOSPITAL ROAD AT EASTERLY SITE DRIVEWAY (HOSPITAL LANE)									
Hospital Road	EB L			0	0	0	0	0	0
	EB T	5%		0	0	0	1	0	1
Hospital Road	WB T		5%	0	1	1	0	0	0
	WB R			0	0	0	0	0	0
Easterly Site Driveway (Hospital Lane)	SB L			0	0	0	0	0	0
	SB R			0	0	0	0	0	0
	SUM								
9. GRANT ROAD AT HOSPITAL ROAD									
Hospital Road	EB L	5%		0	0	0	1	0	1
	EB R			0	0	0	0	0	0
Grant Road	NB L			0	0	0	0	0	0
	NB T	77%		4	0	4	9	0	9
Grant Road	SB T		77%	0	10	10	0	6	6
	SB R		5%	0	1	1	0	0	0
	SUM								
10. GRANT ROAD AT PINE ROAD									
Pine Road	WB L			0	0	0	0	0	0
	WB R	7%		0	0	0	1	0	1
Grant Road	NB U			0	0	0	0	0	0
	NB T	82%		4	0	4	10	0	10
	NB R			0	0	0	0	0	0
Grant Road	SB L		7%	0	1	1	0	1	1
	SB T		82%	0	11	11	0	7	7
	SUM			0	0	0	0	0	0

TRAFFIC GROWTH CALCULATIONS - GODDARD STREET RESI

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

Goddard Street Resi
18 units
under construction

Notes: estimating TD and TG based on ITE
ITE LUC 210 Single-Family Detached
used distribution from emerson green - from the 2020 version of the cfs project, used single family for highest trip gen

INTERSECTION	MOVEMENT	NEW TRIPS ENTER	NEW TRIPS EXIT	AM PEAK HOUR TRIPS ENTER	AM PEAK HOUR TRIPS EXIT	AM PEAK HOUR TRIPS TOTAL	PM PEAK HOUR TRIPS ENTER	PM PEAK HOUR TRIPS EXIT	PM PEAK HOUR TRIPS TOTAL
11. FRONT STREET AT HOSPITAL ROAD									
Front Street	EB T			0	0	0	0	0	0
	EB R	5%		0	0	0	1	0	1
Front Street	WB L			0	0	0	0	0	0
	WB T			0	0	0	0	0	0
Hospital Road	NB L		5%	0	1	1	0	0	0
	NB R			0	0	0	0	0	0
	SUM								
			TRIP GEN	5	13	18	12	8	20

ITE TRIP GENERATION WORKSHEET
(12th Edition)

LANDUSE: Multi-Family Housing (Low-Rise): *2-3 Story* - Close to Rail Transit
LANDUSE CODE: 220 Independent Variable --- Number of Dwelling Units
SETTING/LOCATION: General Urban/Suburban
JOB NAME: 46 units
JOB NUMBER:

WEEKDAY

RATES:

	# Studies	R^2	Total Trip Ends			Independent Variable Range			Directional Distribution	
			Average	Low	High	Average	Low	High	Enter	Exit
DAILY	9	0.93	4.72	2.46	6.34	389	156	854	50%	50%
AM PEAK OF GENERATOR	3	--	0.30	0.20	0.38	263	208	374	29%	71%
PM PEAK OF GENERATOR	3	--	0.45	0.30	0.61	263	208	374	59%	41%
AM PEAK (ADJACENT ST)	3	--	0.30	0.20	0.38	263	208	374	29%	71%
PM PEAK (ADJACENT ST)	3	--	0.45	0.30	0.61	263	208	374	59%	41%

TRIPS:

	BY AVERAGE			BY REGRESSION		
	Total	Enter	Exit	Total	Enter	Exit
DAILY	218	109	109	-270	-135	-135
AM PEAK OF GENERATOR	14	4	10	--	--	--
PM PEAK OF GENERATOR	21	12	8	--	--	--
AM PEAK (ADJACENT ST)	14	4	10	--	--	--
PM PEAK (ADJACENT ST)	21	12	8	--	--	--

SATURDAY

RATES:

	# Studies	R^2	Total Trip Ends			Independent Variable Range			Directional Distribution	
			Average	Low	High	Average	Low	High	Enter	Exit
DAILY	--	--	--	--	--	--	--	--	--	--
PEAK OF GENERATOR	2	--	0.22	0.21	0.24	208	208	208	43%	57%

TRIPS:

	BY AVERAGE			BY REGRESSION		
	Total	Enter	Exit	Total	Enter	Exit
DAILY	--	--	--	--	--	--
PEAK OF GENERATOR	10	4	6	--	--	--

SUNDAY

RATES:

	# Studies	R^2	Total Trip Ends			Independent Variable Range			Directional Distribution	
			Average	Low	High	Average	Low	High	Enter	Exit
DAILY	--	--	--	--	--	--	--	--	--	--
PEAK OF GENERATOR	--	--	--	--	--	--	--	--	--	--

TRIPS:

	BY AVERAGE			BY REGRESSION		
	Total	Enter	Exit	Total	Enter	Exit
DAILY	#VALUE!	#VALUE!	#VALUE!	--	--	--
PEAK OF GENERATOR	#VALUE!	#VALUE!	#VALUE!	--	--	--

TRAFFIC GROWTH CALCULATIONS - GRANT ROAD RESI

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

Notes: estimating TD and TG based on ITE
ITE LUC 220 Low Rise Resi
used distribution from emerson green - from the 2020 version of the cfs project

Grant Road Resi
46 units - 2 buildings
under construction

INTERSECTION		MOVEMENT	NEW TRIPS ENTER	NEW TRIPS EXIT	AM PEAK HOUR TRIPS ENTER	AM PEAK HOUR TRIPS EXIT	AM PEAK HOUR TRIPS TOTAL	PM PEAK HOUR TRIPS ENTER	PM PEAK HOUR TRIPS EXIT	PM PEAK HOUR TRIPS TOTAL
1. JACKSON ROAD AT PATTON ROAD/LAKE GEORGE STREET										
Lake George Street		EB L			0	0	0	0	0	0
		EB T			0	0	0	0	0	0
		EB R			0	0	0	0	0	0
Patton Road		WB L			0	0	0	0	0	0
		WB T			0	0	0	0	0	0
		WB R			0	0	0	0	0	0
Jackson Road		NB U			0	0	0	0	0	0
		NB L			0	0	0	0	0	0
		NB T	77%		3	0	3	9	0	9
		NB R			0	0	0	0	0	0
Jackson Road		SB L			0	0	0	0	0	0
		SB T		77%	0	8	8	0	6	6
		SB R			0	0	0	0	0	0
		SUM			0	0	0	0	0	0
2. JACKSON ROAD AT GIVRY STREET										
Jackson Road	NB in new counts	NEB L			0	0	0	0	0	0
		NEB T	77%		3	0	3	9	0	9
		NEB R			0	0	0	0	0	0
Jackson Road	SB in new counts	SWB L			0	0	0	0	0	0
		SWB T		77%	0	8	8	0	6	6
		SWB R			0	0	0	0	0	0
Givry Street	WB in new counts	NWB U			0	0	0	0	0	0
		NWB L			0	0	0	0	0	0
		NWB T			0	0	0	0	0	0
		NWB R			0	0	0	0	0	0
Givry Street	EB in new counts	SEB L			0	0	0	0	0	0
		SEB T			0	0	0	0	0	0
		SEB R			0	0	0	0	0	0
		SUM								
3. JACKSON ROAD AT PINE ROAD										
Jackson Road		EB L			0	0	0	0	0	0
		EB T			0	0	0	0	0	0
Jackson Road		WB T			0	0	0	0	0	0
		WB R	7%		0	0	0	1	0	1
Pine Road		SB L		7%	0	1	1	0	1	1
		SB R			0	0	0	0	0	0
		SUM								
4. HOSPITAL ROAD AT WESTERLY SITE DRIVEWAY										
Hospital Road		EB L			0	0	0	0	0	0
		EB T	5%		0	0	0	1	0	1
		EB R			0	0	0	0	0	0
Hospital Road		WB U			0	0	0	0	0	0
		WB L			0	0	0	0	0	0
		WB T		5%	0	1	1	0	0	0
		WB R			0	0	0	0	0	0
NE Studios Driveway		NB L			0	0	0	0	0	0
		NB T			0	0	0	0	0	0
		NB R			0	0	0	0	0	0
Westerly Site Driveway (Spruce Street)		SB L			0	0	0	0	0	0
		SB T			0	0	0	0	0	0
		SB R			0	0	0	0	0	0
		SUM								

TRAFFIC GROWTH CALCULATIONS - GRANT ROAD RESI

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

Notes: estimating TD and TG based on ITE
ITE LUC 220 Low Rise Resi
used distribution from emerson green - from the 2020 version of the cfs project

Grant Road Resi
46 units - 2 buildings
under construction

INTERSECTION	MOVEMENT	NEW TRIPS ENTER	NEW TRIPS EXIT	AM PEAK HOUR TRIPS ENTER	AM PEAK HOUR TRIPS EXIT	AM PEAK HOUR TRIPS TOTAL	PM PEAK HOUR TRIPS ENTER	PM PEAK HOUR TRIPS EXIT	PM PEAK HOUR TRIPS TOTAL
5T. HOSPITAL ROAD AT GIVRY STREET WEST									
Hospital Road	EB T	5%		0	0	0	1	0	1
	EB R			0	0	0	0	0	0
	WB T		5%	0	1	1	0	0	0
Hospital Road	NWB L			0	0	0	0	0	0
5. HOSPITAL ROAD AT GIVRY STREET WEST - WHOLE TRIANGLE									
Hospital Road	EB T	5%		0	0	0	1	0	1
	EB R			0	0	0	0	0	0
Hospital Road	WB L			0	0	0	0	0	0
	WB T		5%	0	1	1	0	0	0
Givry Street	NWB BR L			0	0	0	0	0	0
Givry Street	NWB BR			0	0	0	0	0	0
	SUM								
6. GIVRY STREET SPLIT									
Givry Street	NB T			0	0	0	0	0	0
	NB R			0	0	0	0	0	0
	SB L			0	0	0	0	0	0
Givry Street	SB T			0	0	0	0	0	0
Givry Street	SWB L			0	0	0	0	0	0
	SWB R			0	0	0	0	0	0
	SUM								
7. HOSPITAL ROAD AT GIVRY STREET EAST									
Hospital Road	EB T	5%		0	0	0	1	0	1
Hospital Road	WB L			0	0	0	0	0	0
	WB T		5%	0	1	1	0	0	0
Givry Street	NEB BR			0	0	0	0	0	0
	SUM								
8. HOSPITAL ROAD AT EASTERLY SITE DRIVEWAY (HOSPITAL LANE)									
Hospital Road	EB L			0	0	0	0	0	0
	EB T	5%		0	0	0	1	0	1
Hospital Road	WB T		5%	0	1	1	0	0	0
	WB R			0	0	0	0	0	0
Easterly Site Driveway (Hospital Lane)	SB L			0	0	0	0	0	0
	SB R			0	0	0	0	0	0
	SUM								
9. GRANT ROAD AT HOSPITAL ROAD									
Hospital Road	EB L	5%		0	0	0	1	0	1
	EB R			0	0	0	0	0	0
Grant Road	NB L			0	0	0	0	0	0
	NB T	77%		3	0	3	9	0	9
Grant Road	SB T		77%	0	8	8	0	6	6
	SB R		5%	0	1	1	0	0	0
	SUM								
10. GRANT ROAD AT PINE ROAD									
Pine Road	WB L			0	0	0	0	0	0
	WB R	7%		0	0	0	1	0	1
Grant Road	NB U			0	0	0	0	0	0
	NB T	82%		3	0	3	10	0	10
	NB R			0	0	0	0	0	0
Grant Road	SB L		7%	0	1	1	0	1	1
	SB T		82%	0	8	8	0	7	7
	SUM			0	0	0	0	0	0

TRAFFIC GROWTH CALCULATIONS - GRANT ROAD RESI

Project Name: Devens CFS 4
Project No: 14867.01
Location: Devens, MA
Date: July 2025

Grant Road Resi
46 units - 2 buildings
under construction

Notes: estimating TD and TG based on ITE
ITE LUC 220 Low Rise Resi
used distribution from emerson green - from the 2020 version of the cfs project

INTERSECTION	MOVEMENT	NEW TRIPS		AM PEAK HOUR TRIPS			PM PEAK HOUR TRIPS		
		ENTER	EXIT	ENTER	EXIT	TOTAL	ENTER	EXIT	TOTAL
11. FRONT STREET AT HOSPITAL ROAD									
Front Street	EB T			0	0	0	0	0	0
	EB R	5%		0	0	0	1	0	1
Front Street	WB L			0	0	0	0	0	0
	WB T			0	0	0	0	0	0
Hospital Road	NB L		5%	0	1	1	0	0	0
	NB R			0	0	0	0	0	0
	SUM								
			TRIP GEN	4	10	14	12	8	20

Unsignalized Intersection Capacity Analysis

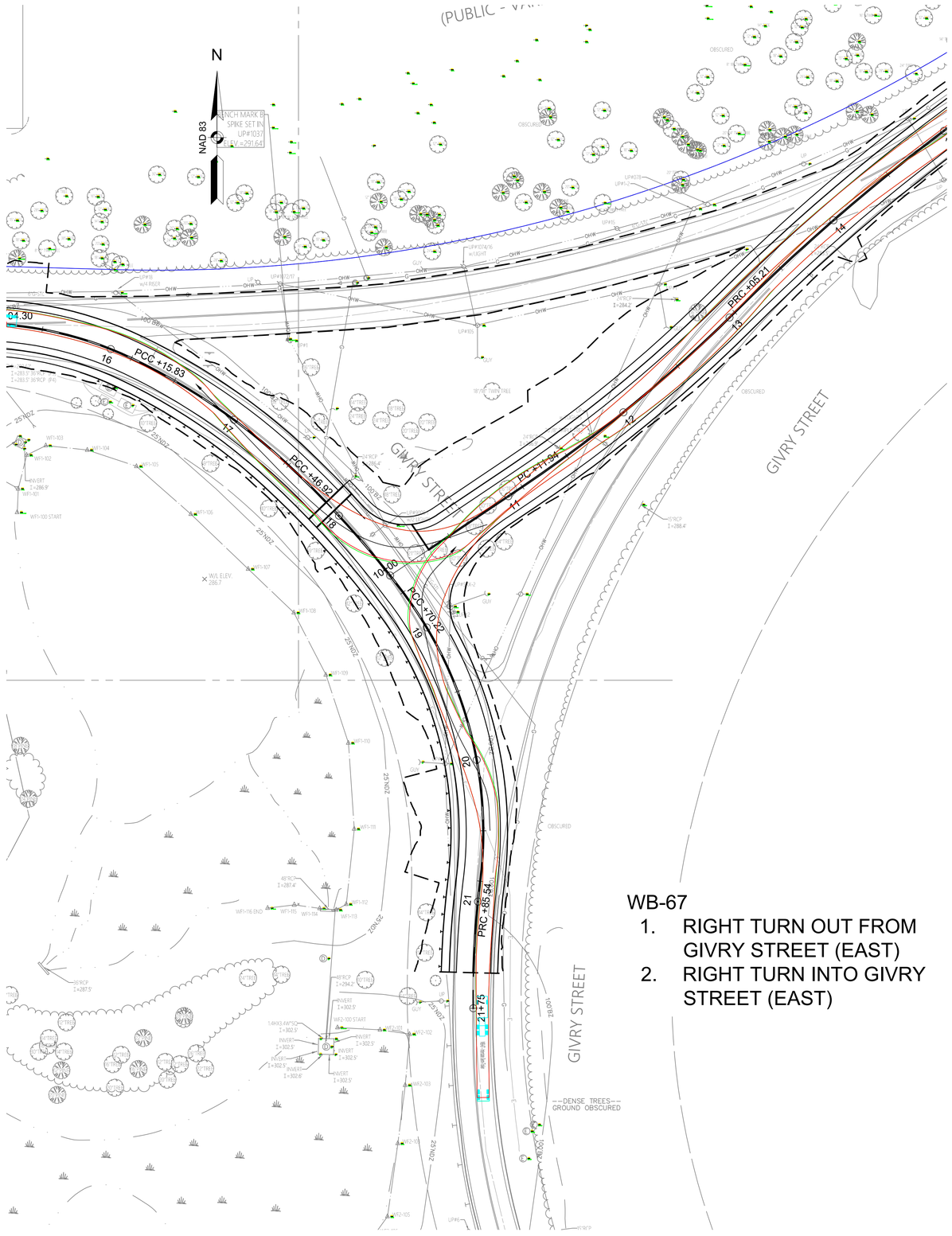
Location / Movement	2025 Existing Conditions					2032 No-Build Conditions					2032 Build Conditions				
	D [a]	v/c [b]	Del [c]	LOS [d]	95 Q [e]	D	v/c	Del	LOS	95 Q	D	v/c	Del	LOS	95 Q
Hospital Road at Westerly Site Driveway/NE Studios Driveway															
Weekday Morning															
EB L	3	0.00	8	A	0	3	0.00	8	A	0	4	0.00	8	A	0
WB L	4	0.00	8	A	0	5	0.00	8	A	0	5	0.00	8	A	0
NB L/T/R	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SB L/T/R	21	0.04	11	B	3	24	0.05	12	B	3	30	0.06	12	B	5
Weekday Evening															
EB L	-	-	-	-	-	-	-	-	-	-	1	0.00	8	A	0
WB L	2	0.00	7	A	0	2	0.00	8	A	0	2	0.00	8	A	0
NB L/T/R	4	0.02	12	B	3	4	0.01	13	B	0	4	0.01	13	B	0
SB L/T/R	77	0.17	13	B	15	89	0.20	14	B	18	110	0.25	15	C	25

a Demand
b Volume to capacity ratio.
c Average total delay, in seconds per vehicle.
d Level-of-service.
e 95th percentile queue, in feet.
f Yield-controlled movement modeled as a stop-controlled movement in Synchro to obtain results.

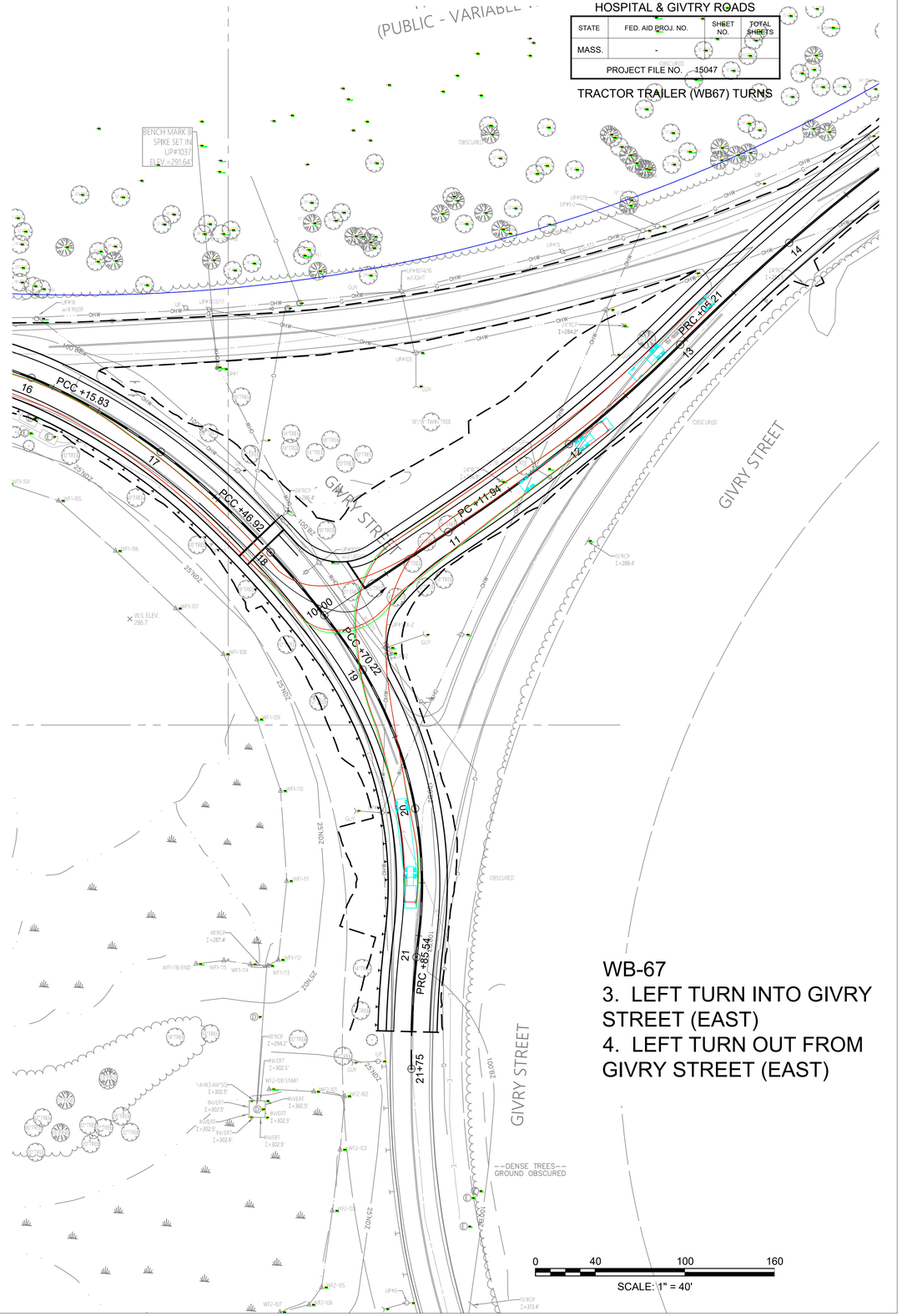
DEVENS
HOSPITAL & GIVTRY ROADS

STATE	FED. AID PROJ. NO.	SHEET NO.	TOTAL SHEETS
MASS.	-		
PROJECT FILE NO. 15047			

TRACTOR TRAILER (WB67) TURNS



WB-67
1. RIGHT TURN OUT FROM GIVRY STREET (EAST)
2. RIGHT TURN INTO GIVRY STREET (EAST)



WB-67
3. LEFT TURN INTO GIVRY STREET (EAST)
4. LEFT TURN OUT FROM GIVRY STREET (EAST)

0 40 100 160
SCALE: 1" = 40'