

September 18, 2025

Devens Enterprise Commission
Neil Angus, FAICP CEP, LFA, LEED AP
Director/Land Use Administrator
33 Andrews Parkway
Devens, MA 01434

RE: Nitsch Project #9419
Mirror Lake Parking
Stormwater Review
Devens, MA

Dear Neil Angus:

Nitsch Engineering (Nitsch) received and reviewed the Site Plans (the Plans) entitled "Mirror Lake Permit Set," dated August 7, 2025, updated September 5, 2025, prepared by VHB. In addition, Nitsch has received and reviewed the following documents:

1. Response Memorandum dated September 5, 2025, prepared by VHB;
2. Level 2 Unified Permit Application, prepared by Mirror Lake Expansion, dated August 13, 2025, updated September 5, 2025;
3. Stormwater Management Report entitled "Mirror Lake Parking Lot Expansion," dated August 7, 2025, updated September 5, 2025, prepared by VHB; and
4. State-Listed Turtle Protection Plan, dated May 2025, prepared by VHB.

Nitsch is providing comments with respect to the Stormwater Management of the Mirror Lake Permit Set in this letter. Devens Enterprise Commission (DEC) and Nitsch had an initial meeting with the Applicant to discuss some clarifications with the initial submission. Nitsch received a response letter on September 5, 2025 with updated plans and a stormwater report clarifying the initial questions. Nitsch is providing the responses below based on the revised submission materials.

PROJECT UNDERSTANDING

The Project Site is located at 98-150 Patten Road and totals approximately 2.5 acres in the Water Resource Protection district. The site is currently developed as a parking lot for visitors to the Mirror Lake recreation area. The Applicant is proposing the construction of 79 additional standard parking spaces and two (2) trailer parking spaces with the supporting stormwater management.

Based on Nitsch's review of the submitted documents and the above-referenced regulations in regular font, we offer the following comments for consideration **in bold font**:

DEC STORMWATER DESIGN STANDARDS

Stormwater Management:

General: Stormwater Management

1. **974 CMR 4.08(3)(h)** requires recommended post-construction erosion control methods include geotextile and /or biodegradable erosion control fabrics staked or anchored to the slope, with loose weave to allow vegetative cover to be established. Vegetative cover shall consist of native woody plant species installed as live brush or nursery stock, or native grasses.

Applicant to provide details of post-construction erosion control methods and maintenance details on plans for different seed mixes and disturbed areas.

Monitoring and Maintenance of Stormwater Facilities

2. **974 CMR 4.08(7)** requires an Operation and Maintenance Plan (O&M Plan) for stormwater management systems at the time of application for all projects. The O&M Plan shall be designed to ensure compliance with the Massachusetts Surface Water Quality Standards (314 CMR 4.00), the Stormwater Plan and the DEC annual stormwater reporting form requirements. The O&M Plan shall be shown on the site plan(s) and shall include at a minimum the following:

The applicant has provided this information in the appendices of the stormwater report including some information on the Grading & Drainage Plan. Applicant to provide a reference to the O&M Plan on the plan set.

CONFORMANCE WITH THE MASSDEP STORMWATER STANDARDS

In accordance with **974 CMR 4.08(2)(a)**, Nitsch reviewed the stormwater design and calculations for general conformance with the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Standards. Based on this review, Nitsch offers the following comments:

3. **Standard 6** requires stormwater discharges within the Zone II or Interim Wellhead Protection Area of a public water supply, and stormwater discharges near or to any other critical area, require the use of the specific source control and pollution prevention measures and the specific structural stormwater best management practices determined by the Department to be suitable for managing discharges to such areas, as provided in the Massachusetts Stormwater Handbook. A discharge is near a critical area if there is a strong likelihood of a significant impact occurring to said area, taking into account site-specific factors. Stormwater discharges to Outstanding Resource Waters and Special Resource Waters shall be removed and set back from the receiving water or wetland and receive the highest and best practical method of treatment. A "storm water discharge" as defined in 314 CMR 3.04(2)(a)1 or (b) to an Outstanding Resource Water or Special Resource Water shall comply with 314 CMR 3.00 and 314 CMR 4.00. Stormwater discharges to a Zone I or Zone A are prohibited unless essential to the operation of a public water supply.

Applicant meets the requirements of Standard 6; however, it is not documented that the project is within a Zone II in the MassDEP Stormwater Checklist or under the Regulatory Compliance section in the stormwater report. Applicant to revise narrative to identify how the requirements of Standard 6 are met.

If the Commission has any questions, please call.

Very truly yours,

Nitsch Engineering, Inc.



Sydne Picard, EIT, AICP, ENV SP
Planner/Senior Water Resources Designer

Approved by:



Sandra Brock, PE, LEED AP
Vice President

SMP/SAB/pfv