



Memorandum

To: Neil Angus
Devens Enterprise Commission
33 Andrews Parkway
Devens, MA 01434

Date: 10/13/2026

Project #: 14867.07

From: Eric O'Brien

Re: Commonwealth Fusion Systems Building 4 (CFS-4)
Level 2 Permit Amendment Narrative Memorandum

Introduction

On behalf of Commonwealth Fusion Systems (CFS), VHB is pleased to submit this Level 2 permit amendment for the "Commonwealth Fusion Systems Campus Building 4" project, also referred to as "CFS-4," which received its Record of Decision from the Devens Enterprise Commission on December 22, 2025.

In addition to this amendment narrative our submission also includes a signed application form, submission fee check, and the specific documentation you requested in an email dated 9/24/26, including: a selection of revised Site Plans, a supplemental comparison plan showing the original and revised site layouts side-by-side, and a fully revised Stormwater Report. The updated campus sound study is expected to be ready by October 22, 2026 and will be forwarded to the DEC when available.

Purpose of Amendment

The nature of the CFS-4 project has not changed since the original submission; it continues to be a highly specialized research facility consisting of both interior and exterior industrial equipment, tanks, pumps, controls, etc. with the purpose of conducting fusion-related heat transfer experiments using a molten salt known as "FLiBe." Major outdoor equipment continues to include gas-powered natural gas burners, condenser units, generators, and nitrate tanks as in the original submission, with one notable difference being the removal of the separate "Annex" control building, which has now been integrated into the main CFS-4 building (and thus eliminated from the site plans). The CFS-4 site will continue to have zero full time employee work stations on-site; employees conducting research and monitoring operations of the facility will typically walk to CFS-4 from other buildings on campus.

While the nature of the project remains the same as in the original application, this amendment is warranted based on a minor change to the location of the CFS-4 building and exterior industrial equipment, shifting both approximately 70 feet to the north, with associated revisions to site layout, circulation, grading, and utility routing. This relocation is the result of a value engineering exercise which identified a large volume of buried topsoil from previous phases of campus development located directly below major building and equipment foundations. As this buried topsoil is not suitable to bear structural loads, CFS made the decision to shift the project to the north to reduce topsoil excavation, eliminating the need for deep foundations, and allowing the structures to bear on more suitable strata.

This restructuring of the site (in conjunction with programmatic revisions to the interior of the CFS-4 building) allowed for an additional benefit; with the project now located further from the existing CFS-2 building, there is enough room to consolidate the two separate utility yards (previously tiered at two different elevations) into a single yard at a consistent elevation. This further reduces earthwork operations and comes with a net reduction in impervious coverage.

Stormwater Management Design

The stormwater treatment system remains functionally identical to the original permitted design. Treatment and groundwater recharge continue to be provided by an array of subsurface concrete chambers (12 ' StormCapture units) with pretreatment provided by deep-sump hooded catch basins and the same structural Water Quality Unit as before. Minor changes to the StormCapture unit detail were required to account for site regrading and efficiencies provided by both a revised chamber layout and an overall reduction in contributing impervious coverage. The stormwater design continues to comply with all Massachusetts and Devens stormwater standards and infiltrates all storm events up to and including the 100-year storm, as previously permitted. A revised Stormwater Report has been provided.

Green Roof

The Annex building previously supported the required green roof for the project. In the revised site plan, the Annex building has been eliminated and the green roof relocated to the CFS-4 building. Since there is now a reduction in usable roof area for the project, the required green roof square footage has been revised to remain consistent with the 30% green roof criteria. This revised calculation is included on the Site Plans.

Landscaping

The landscaping plan is similar in scope to the permitted design, however due to the site shifting closer to the northern property line, four perimeter trees were relocated to a newly planted area to the south (adjacent to the CFS-2 building). As discussed previously, this newly planted area is a level landscaped strip that will be used for construction enabling purposes (contractor trailer laydown), which CFS has agreed to plant with additional trees following construction. In addition to the four relocated trees, an additional four new trees are proposed for this area, resulting in a +4 tree increase when compared to the original permitted design.

Conclusion

We believe that that revised site design is compliant with the Devens Rules and Regulations and requires no additional waivers beyond those which were granted in the original Record of Decision. We also believe that, based on the minor nature of the changes, along with various email correspondences and feedback received during a 9/22/26 pre-filing discussion, we have provided the necessary information for the DEC to adequately assess the proposed site changes. If any additional information is required please do not hesitate to reach out to VHB for assistance.

Sincerely,



VHB

Eric O'Brien
Senior Project Engineer