



September 24, 2025

Jillian Wahl
Reframe Systems
30 Lowell Junction Road
Andover, MA 01810

Re: Reframe Systems – 100 Adams Circle Innovative Residential Development Level II Unified Permit Application Response to Review Comments (#D25-008)

Dear Jillian,

We have reviewed your revised plans, responses and supporting information submitted on September 17, 2026 for the above-mentioned application. Below are the follow-up comments from the DEC and MassDevelopment (in green). Follow-up review comments on the stormwater design from our peer review engineers are being provided in a separate letter.

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

1. Construction phasing narrative description required.

REFRAME Response: Construction will be performed in two phases:

- Phase 1: Homes 1-10 (addresses 25-33) and associated utility work, plus all site stormwater infrastructure and erosion controls.
- Phase 2: Homes 11 & 12 (addresses 35A & 35B) and associated utility work.

DEC 9/24/25 Response: noted. Include on C-101 and 201.

2. Opportunities to provide formal connection to existing trail on adjacent open space (Ley Hill, named after the Fred T. Ley Company – the general contractor who built the original Camp Devens in 1917).

REFRAME Response: We note that the trail head occurs outside the SE corner of our property. The lot boundaries do not include public space for a connection. We note that the next phase of developing this area would more easily include a trail extension at the SE corner.

DEC 9/24/25 Response: While outside of the project boundary, the land is in common ownership. MassDevelopment should provide an easement.

3. Provide narrative describing how landscaping, porous pavements, and common areas on properties will be managed and maintained. Confirm responsibility for trash, recycling and composting collection. Details should be included in a homeowners/condo manual(s) with maintenance details. A draft manual should be provided.

REFRAME Response: See draft maintenance plan attached.

DEC 9/24/25 Response: Manual provided but still some elements missing:

- a) Porous pavement maintenance requires special maintenance and should be noted as per MA DEP SWM Standards.
- b) Organic slow-release fertilizers should be noted as well.

- c) Yard waste disposal – Devens DPW does provide residential collection – check with Devens DPW.
 - d) Tree removal restrictions should be noted (rear of lots/slope tree protection). If a CR is to be placed, details should be provided on that and why (slope stability, stormwater, habitat, etc.)
 - e) Biofiltration swale easement should be called out here specifically to ensure homeowners do not alter or fill these areas.
4. Building elevations provided. Design review letter to be provided by MassDevelopment prior to public hearing.
- REFRAME Response: Design review letter will be provided by Erik Hokenson from MassDevelopment.*
- DEC 9/24/25 Response: noted. Provide prior to public hearing.
5. Look for additional opportunities to reduce gutters/downspouts and decentralize runoff and directly infiltrate where feasible (or discharge to porous pavement or other permeable surfaces). If any irrigation is proposed, will need to utilize harvested rainwater.
- CEC Response: The previously proposed closed pipe network has been eliminated in favor of decentralized runoff. Roof drain downspouts will discharge to splash pads before flowing overland. No irrigation is proposed.*
- DEC 9/24/25 Response: Comment addressed.
6. Design review approval letter required from MassDevelopment.
- REFRAME Response: Design review letter will be provided by Erik Hokenson from MassDevelopment.*
- DEC 9/24/25 Response: noted. Provide prior to public hearing.
7. Revise Stormwater management design narrative to include stamp and signature of a registered Professional Engineer in the Commonwealth of Massachusetts certifying that the project complies with the requirements of 974 CMR 3.04(4), Stormwater Management Design Standards, and 974 CMR 4.08, General: Stormwater Management.
- CEC Response: The updated Stormwater Report is stamped and signed by a Professional Engineer in the Commonwealth of Massachusetts.*
- DEC 9/24/25 Response: report is stamped but Project Narrative Introduction (1.1) needs to certify that “the project complies with the requirements of 974 CMR 3.04(4), Stormwater Management Design Standards, and 974 CMR 4.08, General: Stormwater Management.”
8. Final endorsed plan sheets will need to meet all Worcester registry recording requirements (including listing Harvard in parentheses in the title block).
- CEC Response: We assume that the Lotting Plan from the Definitive Subdivision Plan prepared by MassDevelopment will need to be recorded at the Worcester Registry, rather than the endorsed Site Plans. Harvard has been added to the title block of the Civil Level 2 unified Permit Set.*
- DEC 9/24/25 Response: Yes, the Lotting Plan will need to be recorded to create the lots but we also require selected sheets from the plan set to be filed (cover sheet, existing conditions, site plan, grading/drainage, utilities and landscape plans) so these should all meet registry recording requirements: <https://massroads.com/worcester/recorded-land-plans/>
9. Owner is MassDevelopment. Separate Owner and Applicant info on cover sheet.

REFRAME Response: See updated architectural title sheet A000 with owner and applicant information listed separately. Owner information has been updated on the Civil Level 2 unified Permit Set as well.

DEC 9/24/25 Response: Comment addressed.

10. Property within 1000 feet of county boundary. Ensure ties to boundary are included on final plans.

REFRAME Response: Noted.

DEC 9/24/25 Response: Will be required as a condition of approval.

11. Ensure DEC signature endorsement block is included on all plan sheets.

REFRAME Response: Noted. Signature block is included on the architectural and civil plan sheets. On title sheet A000, a signature line and date has been added.

DEC 9/24/25 Response: Comment addressed.

12. Provide narrative describing safety design of units and fire access to units.

REFRAME Response: Narrative has been included.

DEC 9/24/25 Response: Narrative provided. Fire Department reviewing.

13. Provide narrative from MassDevelopment regarding proposed scope of ROW improvements for context (grading, drainage, utilities, sidewalks, curbing, signage, striping, landscaping, etc.).

REFRAME Response: See narrative attached.

DEC 9/24/25 Response: Comment addressed.

14. Include typical private utility connection details for each home (type, size, class, location).

REFRAME Response: See sheet C501. Water: 1" copper, location per plan. Sanitary: 4" PVC, location per plan. Typical utility connections are shown on Detail Sheet C800.

DEC 9/24/25 Response: Comment addressed.

15. Provide lighting fixture details to confirm compliance with 974 CMR 3.04 and 3000K max temperature/color.

REFRAME Response: Spec sheet for outdoor light fixture has been included with response.

DEC 9/24/25 Response: Fixture detail is compliant. Please add to final plan.

16. Provide erosion and sediment control plan details to ensure safety and proper containment and reduced potential for nuisance conditions to adjacent residential uses. Also include applicable sections from "5.0 Construction Sedimentation and Erosion Control Plan" in Stormwater Report, on Erosion and Sediment Control Plan sheet C100.

CEC Response: Typical erosion and sediment control details are shown on Detail Sheet C800, which correspond to proposed erosion and sediment control design identified on Sheets C100 and C101. A note has been added to Sheets C100 and C101 referring contractor to the project Construction Sedimentation and Erosion Control Plan provided in the project Stormwater Report.

DEC 9/24/25 Response: Erosion and sediment control notes need to be included on the erosion control plan. Refer to [974 CMR 3.02\(3\)\(e\)](#) and include relevant items/requirements from this and Stormwater report. Dust control is not mentioned in Stormwater report.

17. All references to right of way and utility improvements on plans should specify that work is to be done by MassDevelopment and not the Devens Enterprise Commission.

CEC Response: References with respect to right of way and utility improvements have been revised to state work is to be done by MassDevelopment.

Demolition Note 5 mentions Utility company is referenced on Cover sheet however it is not. All references to the Utility Company should reference MassDevelopment/Devens Utilities. Note 14 should also reference the Devens Enterprise Commission as the local Board of Health for any notification of demolition of regulated items. Grading Note 13 references Devens Enterprise Commission (DEC) but needs to reference Devens Soil Management Policy. Storm Drainage notes refer to DEC but should include MassDevelopment as well. Plan notes for hydrants on Sheets C100 and C101 still reference Devens Enterprise Commission. Need to reference Devens Utilities and Devens Fire Department. Correct on final plan set.

18. If helpful to the design/layout, you may be able to push the front of the homes a little closer to the road and place the porches within the 25' setback, keeping the principle structure outside of the setback (making the argument that the porches are not a habitable part of the structure). This would reduce driveway lengths and grading in front, while pulling the homes further back from the slope areas. This could allow for additional tree preservation at the base of the rear slopes on lots 12, 13, and 14.

REFRAME & CEC Response: Reframe and CEC have reviewed and agree that moving the homes closer to the road is beneficial. The proposed building locations have been revised to reduce the driveway lengths and to shift the homes away from the slope areas. The principal buildings remain in compliance with the 25' front setback requirement. The principal buildings are setback 29'-35'.

DEC 9/24/25 Response: You'll need to formally request a waiver from 974 CMR 3.04(1)(a) for the front yard setback. You are still showing a large area of tree removal in the rear. We were hoping allowing this flexibility would reduce the need for existing vegetation removal. I should note that as per 974 CMR 3.02(3)(b)6.a. the plans need to show all trees 12" caliper or greater within 100 feet of the property boundary so that it is clear what specific trees are being proposed for removal and which ones need to be preserved. Are there any 12" caliper or greater trees in the area to be cleared on the back of lots 12-14? If you can pull the limits of clearing /grading back and preserve the existing treeline, you could request a waiver from this requirement as well but if not, and there are trees over 12" caliper, you'll have to get a surveyor out there to ID any trees 12" caliper and over within this area to show on the plan.

19. Please clarify affordable unit mix details. DEC regulations will require a minimum of 3 units (1 @ 80% and 2@100% or 120%).

REFRAME Response: The development is providing (2) unit at 80% and (1) units at 120% AMI. These units will be included in Phase 2 of the development.

DEC 9/24/25 Response: Affordable units are required to be constructed in proportion to the number of market rate units. A minimum of two (2) of the three affordable units will need to be constructed in Phase 1.

Additional DEC Comments on revised plans 9/24/25:

20. Please indicate how proposed fencing is to be installed along rear property line without slope disturbance. Consider no fence along rear line or relocating fencing to toe of slope.
21. Slope areas should be protected through a conservation restriction so that homeowners do not cut down trees and create slope issues.

22. Drainage easements will be required for the biofiltration swale. How will fencing cross this area?
23. individual trees to be removed are shown on the demo plans, we would like to see them on the construction plans to know if it is possible for work zone to shift for the trees to be protected.
24. Landscaping – please switch to natives (straight species when possible) unless there is circumstance that warrants use of other. The trees look appropriate, but the shrubs have many nonnatives. If any of these are proposed you must justify why there is no native alternative.
25. The area around the bioswale is hatched to indicate lawn plantings. This area should be planted to the detail and supplemented with conservation seed mix (if warranted), not lawn.
26. Landscape notes (C701):
 - a. Plants should be locally sourced. (Notes mention non-local plants)
 - b. Invasive weeds listed in notes should be edited based on the invasives found at the site. The control plan should be specific to the invasives found on site.
 - c. Construction entrance should specify the size of crushed stone – needs to be coarse enough to prevent mud from reaching roadways.
 - d. Notes should indicate plant substitutions need to be approved by DEC.
 - e. New plantings will likely need to be watered for longer than 60 days.
27. Identify what is proposed between the carports and the sheds. Patio or grass, paver walkway. Neither the white or the grey rectangles are identified.
28. Identify what is proposed behind the houses? Rear steps, patio?
29. Add proposed building area, impervious area, permeable pavement area to zoning table on plan C200 on final plans.
30. Provide dimensions and details for sheds.

Devens Fire Department:

1. MassDevelopment has indicated they will be replacing the water line along Admas Circle to accommodate these new homes. A hydrant will need to be included and all homes will need to be sprinklered. Attached car ports may also need some level of fire suppression. Applicant will need to provide fire protection narrative as part of building permit and have fire protection engineer review updated MA Fire Code to determine if carports will need to be sprinklered since they are attached.

REFRAME Response: See MDFA narrative attached. All homes shall be sprinklered with NFPA 13D system. Note that carports are structurally independent of the homes. Each carport will have [1] sprinkler head, as a side wall head from the main home. Any required hydrant relocations are to be done by MassDevelopment as part of the proposed right-of-way and utility improvements.

2. Due to helical pile foundation, details for freeze/thaw protection for water and sewer connections to buildings will be required as part of the building permit review.

REFRAME Response: Noted. All piping connections exposed to freeze/thaw shall be protected.

Devens Engineering:

1. Both water lines were shown on the CAD files sent to Reframe.

REFRAME Response: Noted.

2. The utility work will be included on the Roadway/utility project being performed by MDFA.

CEC Response: Utility work proposed in right of way has been updated to identify MassDevelopment as performing the work.

Devens Utilities:

1. The existing 6" water main, which is routed along the shoulder of the road in front of the proposed houses, on the plans needs to be shown. This water main is currently live and in service. MDFA is responsible for constructing a new 8" ductile iron water main to replace the existing 6" main. Devens Utilities will check the valves at each end of this existing 6" main to determine how best to isolate this pipe to take it out of service when it is time to start construction. Devens Utilities will have an 8" water main looped around the west side of Adams Circle that should allow them to take the 6" main out of service without impacting any customers.

CEC Response: The existing 6" water main has been added to the existing utilities shown in Adams Circle on the Site Plans. We understand MassDevelopment will be performing utility improvements in Adams Circle.

2. Devens Utilities records indicate the existing water main is comprised of asbestos-cement pipe and, given the location, should probably be removed as part of this overall project. Responsibility for removal should be clarified as part of this application as it will require special handling.

REFRAME Response: See MDFA narrative attached.

3. Installation of the new water main and sewer line to be installed by MDFA to serve the new houses will need to be closely coordinated with the project proponent (ex., will sewer wye connections be included in MDFA's scope of work to avoid having to cut in wyes to serve the houses after the sewer main is constructed?

REFRAME Response: Reframe is working with MDFA to coordinate all utility work with project work for efficiency of installation.

4. Detail Sheet C801 includes details for hydrants and gate valves, but I don't think any of those structures are to be installed as part of the housing project. I believe those structures would be installed as part of MDFA's project. May be appropriate to remove those details from the plans to avoid confusion about who is to do that work.

REFRAME Response: Referenced details have been removed to be consistent with project scope.

Please provide any responses and supporting information to these and all peer review comments by **September 30, 2025**. In the meantime, feel free to contact me with any questions.

Sincerely,



Neil Angus, FAICP, LEED AP
Director
Devens Enterprise Commission

cc: Erik Hokenson, MassDevelopment Real Estate, Chief Kelly, Devens Fire
Mark Cohen, Devens Utilities John Marc-Aurele, Devens Engineering



DEVENS ENTERPRISE COMMISSION

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