



MILLENNIUM ENGINEERING, INC.
Land Surveyors and Civil Engineers

June 12, 2026

Mr. Pascal Rettig, Chairman
Amesbury Planning Board
52 Friend Street
Amesbury, MA. 01913

Mr. Nipun Jain, Director
Amesbury Community & Economic Development
39 South Hunt Road
Amesbury, MA. 01913

Re: Re-submittal for the Floodplain Special Permit
29 Water Street – Amesbury, MA.

Members of the Board,

On behalf of the applicant, 21 Water Street Realty Trust, Millennium Engineering, Inc. has drafted the following memo outlining the applicability of the wetland and floodplain protection special permit for the proposed improvements at 29 Water Street Amesbury, MA.

Criteria for approval per Section XII of the Amesbury Zoning Ordinance:

- A. The lowest floor, including the basement or cellar of any new or substantially improved residential building, shall be at least one (1) foot above base flood elevation. Non-residential construction or improvement shall be elevated or floodproofed above the base flood elevation.*

The proposed project involves the restoration of the existing mill structure with the goal of preserving and incorporating its historic architectural features. Raising the ground floor above the base flood elevation would require substantial modifications to the building that would compromise its historic character and integrity.

While the ground floor (Elev. 10.0) is located below the base flood elevation (Elev. 10.8), no habitable space is proposed within this area. The ground floor will be limited to mechanical equipment and storage uses, with all mechanical equipment, utilities, and stored materials elevated to a minimum of one foot above the base flood elevation. In addition, flood vents are proposed at the ground floor level to allow the free passage of floodwaters.

These measures will minimize the potential for flood damage while allowing for the preservation and adaptive reuse of the historic structure, which otherwise would not be possible without major alterations to the building.



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- B. *The proposed construction and/or change in grade will not obstruct or divert flood flow, reduce natural flood storage, increase storm water runoff, or raise the base flood elevation of the land.*

The proposed work does not involve alterations to existing grades or an increase in impervious surface area that would result in changes to flood storage volume or increase in stormwater runoff. The perimeter of the building will remain vegetated with landscaped and lawn areas, preserving the existing pervious conditions adjacent to the structure.

- C. *The proposed system of drainage and sewage disposal will not cause pollution or otherwise endanger the public health and adequate drainage is provided to reduce exposure to flood hazards.*

There is no existing or proposed stormwater drainage system associated with the project. As no increase in impervious area is proposed, post-development runoff rates are expected to remain consistent with existing conditions. In addition, roof runoff is considered a source of uncontaminated runoff under the Massachusetts Stormwater Management Standards; therefore, no stormwater treatment measures are proposed.

- D. *The proposed construction will have sufficient structural safety to counteract any buoyancy or water impact.*

Flood vents are proposed in the ground floor enclosure of the existing structure to allow the free passage of floodwaters in accordance with applicable FEMA and Massachusetts floodplain requirements.

- E. *The proposed construction shall have street or other appropriate access above the base flood elevation and all proposed public utilities and facilities are located and constructed to minimize or eliminate flood damage.*

The project abuts Water Street, a public way that will provide primary access to the site. Construction access will be taken from Water Street at the frontage of the subject parcel, providing direct entry into the construction area. The entire site and surrounding area, including the public way, is located within the flood zone and therefore access above flood elevation is not feasible.

The project does not propose any changes to public infrastructure or access routes, and Water Street will continue to function as the existing access to the site. Portions of the roadway may be subject to inundation during base flood conditions, consistent with existing floodplain mapping.

- F. *The proposed construction shall not cause erosion and sedimentation in accordance with sedimentation and erosion control measures.*

Erosion and sedimentation control measures are included as part of the proposed construction. Chain-link construction fencing with a silt sock (or equivalent sediment barrier) installed along the perimeter of the construction zone is proposed to reduce the potential for erosion and sediment transport during construction activities.



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All erosion and sediment controls will be installed prior to the commencement of construction and maintained throughout the duration of the project in accordance with the Massachusetts DEP standards.

- G. *The proposed floodproofing or compensatory flood storage method shall be certified by a registered professional engineer. One hundred percent compensatory flood storage shall be provided at every flood interval, and compensatory wetland shall be planted with vegetation.*

Flood vents are proposed at the ground floor enclosure of the existing structure to allow the free passage of flood waters in accordance with applicable floodplain requirements.

No site grading or filling is proposed within the floodplain; therefore, no loss of flood storage volume will occur, and compensatory flood storage calculations are not required.

- H. *In a riverine situation, the project proponent shall notify, prior to any alteration or relocation of a watercourse*

The proposed project does not include any alteration or relocation of a watercourse.

We trust this response letter provides the necessary information for the Board's review. If you have any questions or comments, please feel free to contact our office at your convenience.

Sincerely,

Millennium Engineering, Inc.

Sam Colombo
Project Manager