



## Memorandum

To: Pascal Rettig  
Planning Board Chair  
City of Amesbury  
62 Friend St.  
Amesbury, MA 01913

Date: August 3, 2026

Project #: 201048.00

From: Nathan A. Poretta, PE  
Frank Dipietro, PE

Re: Proposed Rocky Hill MBTA Community Development  
Elm Street, Amesbury, Massachusetts  
**Site Plan and Civil Engineering Peer Review #3**

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### Overview

On behalf of the City of Amesbury, VHB conducted a third independent peer review of the revised site civil engineering and stormwater management design prepared by Millennium Engineering, Inc. for the proposed Rocky Hill MBTA Community Development, located on and off Elm Street in Amesbury, Massachusetts. The project proposes a large-scale residential development within the MBTA Communities Multi-Family Overlay District, consisting of a mix of multi-family and single-family residential buildings, together with associated site improvements including internal roadways, parking areas, utilities, grading, landscaping, and stormwater management infrastructure.

The purpose of this third peer review is to provide the Amesbury Planning Board with an objective technical evaluation of the revised civil and stormwater design relative to applicable municipal regulations, the Massachusetts Stormwater Management Standards, and generally accepted engineering practices. The review focuses on the adequacy, consistency, and technical support for the revised site layout and stormwater management systems, including applicant responses to prior review comments, to help inform the Planning Board's continued consideration of the project.

For ease of reference, VHB's original comments are identified by date and shown in **bold**. Applicant responses are shown in *italics*, followed by VHB's follow-up comments and recommendations in **bold**.

VHB participated in an informal coordination meeting on May 28th, 2026 with the Applicant's engineering team and the Amesbury Staff to discuss some of the technical items within the project.

### Proposed Project

This section summarizes the project as reflected in the revised plans and supporting materials submitted for this third peer review.

The project consists of the Rocky Hill MBTA Community Development, a large-scale residential development located on and off Elm Street in Amesbury, Massachusetts, within the MBTA Communities Multi-Family Overlay District. The development includes a mix of multi-family residential buildings and single-family residential units, together with associated community buildings, internal roadways, parking areas, utilities, grading, landscaping, open space, and stormwater management facilities, as shown on the submitted Site Plan Review plans.

Vehicular access is provided by a primary access driveway on Elm Street, together with a secondary/emergency access connection to the north. Internal roadways are intended to provide circulation throughout the site and serve the proposed residential buildings, parking areas, and emergency vehicles. The project also includes pedestrian facilities, open space areas, and related site infrastructure.

Stormwater runoff generated by the development is proposed to be managed through a system of surface and subsurface drainage infrastructure, including infiltration-based stormwater management practices and associated conveyance systems, intended to address both construction-phase and long-term post-development conditions.

The findings of VHB's review are presented in the following sections, with comments and recommendations identified and numbered throughout the document.

## Scope of Review

The following documents and topics were reviewed by VHB on behalf of the Amesbury Planning Board, including but not limited to:

- › Stormwater Management Report prepared by Millennium Engineering, Inc., dated August 11, 2025, revised July 7, 2026.
- › Site Plan Review Plans (Civil and Landscape Plans) prepared by Millennium Engineering, Inc., dated August 11, 2025, revised June 29, 2026.
- › MEI's Response to Comments prepared by Millennium Engineering, Inc. dated June 29, 2026.
- › City of Amesbury Stormwater Management Ordinance (Chapter 398) and related Stormwater Management & Erosion Control Regulations
- › Amesbury Zoning Ordinance and Zoning Map, (Adopted April 12, 1971 with Revisions Through April 30, 2025) including the MBTA Communities Multi-Family Overlay District
- › Applicable sections of Amesbury Subdivision Rules and Regulations (June 29, 2020, Revised January 7, 2025) per Section XI.Q.10.5.a.5(f) & (g)) of the Amesbury Zoning Ordinance
- › Massachusetts Stormwater Management Standards and Massachusetts Stormwater Handbook
- › Adequacy of proposed stormwater management systems, including sizing, pretreatment, infiltration, and outlet structures
- › Grading and drainage design, including pre- and post-development hydrology, stormwater routing, and peak-flow mitigation
- › Erosion and sedimentation controls for construction-phase compliance
- › Long-term operation and maintenance of stormwater infrastructure
- › Utility layout
- › Conformance with applicable municipal design standards for site layout, access, and infrastructure
- › General Engineering Practice
- › Waiver requests and supporting justification, as submitted
- › Responses to comments from the Planning Board, municipal staff, and other reviewing agencies, as applicable

## Missing Materials

VHB has reviewed the submitted documents and identified several items that are either missing or incomplete to a degree that prevents full technical review. Some of these items are not technical in nature but are included for the Planning Board's awareness as part of its overall project review. The list below reflects the materials identified to date,

however, additional items may be required as further information is submitted or as the design is refined, including but not limited to the following:

- › Hydraulic Calculations for Storm Drain Pipes and Outlets
- › Retaining Wall Details, (See Conformance with the Zoning Ordinance section below)
- › Landscape Plan Calculations, (See Conformance with the Zoning Ordinance section below)
- › Confirmation of Lot Consolidation (ANR Plan)
- › Groundwater Mounding Analysis (See Stormwater Management and Wetlands Compliance section below)
- › Open Space Ownership & Maintenance Entity Formation Copies, See Conformance with the Zoning Ordinance section below)
- › Utility capacity confirmation (Planned Infrastructure & CIP), (See Conformance with the Zoning Ordinance section below)
- › A consolidated list of all waiver requests, including clear references to applicable bylaw sections and supporting justification
- › Zoning compliance tables summarizing proposed conditions relative to dimensional, parking, and all other applicable zoning requirements
- › Turning movement analysis demonstrating accommodation of emergency vehicles, service and delivery vehicles, moving trucks, and refuse collection vehicles within the proposed roadway network and site circulation
- › Environmental and Community Impact Analysis
- › Snow storage Plan
- › Photometric Plan
- › Operation & Maintenance Plan / Long Term Pollution Prevention Plan

Since issuance of VHB's initial peer review, the Applicant has submitted revised plans and supplemental materials that address portions of the original Missing Materials list. Based on VHB's review, items such as the photometric plan, turning movement exhibits, Operation and Maintenance / Long-Term Pollution Prevention materials, groundwater mounding calculations, cut and fill analysis, conceptual utility layouts, open space tabulations, and proposed subdivision / lotting information have now been provided in some form. Nevertheless, several of these materials remain only partially responsive or require additional clarification and support. The list below reflects materials that continue to appear missing, incomplete, or insufficiently documented based on the current submission, including but not limited to the following:

- › Hydraulic Calculations for Storm Drain Pipes and Outlets
- › Site plan or exhibit identifying the Double Ring Infiltrometer testing locations
- › PE-stamped infiltration testing report and supporting documentation
- › Explicit drawdown time calculations for each infiltration BMP
- › Site-wide Total Phosphorus removal calculation weighted by tributary impervious area
- › Pretreatment sizing documentation, including WQU sizing / sediment storage volume
- › Documentation supporting constructed wetland flow path ratio and pond-scaping / planting design

- › Final utility capacity confirmation from Amesbury DPW / applicable providers
- › Consolidated waiver list with bylaw citations and justification
- › Legal documents identifying long-term ownership / maintenance responsibilities and easements
- › Written Fire Department confirmation
- › Any remaining proprietary BMP support documentation
- › Accessible parking summary by parking facility / use
- › EV-ready / accessible EV summary and representative layout details
- › Snow storage plan / figure with supporting calculations
- › Noise memo from acoustical engineer
- › Trail ownership / maintenance / accessibility clarification
- › Typical emergency overflow detail

**Since issuance of VHB's May 13, 2026 peer review letter, the Applicant has submitted revised plans, calculations, response materials, and supplemental documentation addressing a number of the previously identified items. Comments determined to be fully addressed in the May 13, 2026 letter are not repeated below. Several remaining items have been partially addressed but continue to require additional documentation, clarification, an approval condition, or Planning Board determination. Based on VHB's review of the current submission, the following materials or supporting information remain missing, incomplete, or insufficiently documented, including but not limited to:**

- › General construction sequencing plan
- › Draft planning-level Stormwater Pollution Prevention Plan
- › Project-wide geotechnical review
- › Final snow-management documentation
- › Accessible and van-accessible parking calculations for each individual parking facility
- › Representative EV charging-equipment layouts
- › Conceptual locations for transformers, generators, switchgear, and other major electrical equipment
- › Revised stormwater treatment documentation demonstrating at least 90% average annual TSS removal for the North Neighborhood treatment trains and site-wide TSS and TP load reductions
- › Operation and Maintenance Plan and Long-Term Pollution Prevention Plan

**Certain additional items may appropriately be addressed through conditions of approval or Planning Board policy determinations, as identified in the detailed comments below. This list is intended as a high-level summary only, the corresponding detailed comments and recommendations should be referenced for the specific information requested and the appropriate timing for resolution.**

#### **Waiver / Relief Tracking**

Several comments identify items where the Applicant may be proposing conditions that differ from applicable zoning, subdivision, or site design standards. VHB recommends that the Applicant provide a consolidated

waiver/relief table identifying each applicable section, the required standard, the proposed condition, the nature of the deviation, and supporting justification for Planning Board consideration.

## Conformance with the Zoning Ordinance

This review was conducted on behalf of the Amesbury Planning Board to identify areas where the proposed project may not fully comply with the Amesbury Zoning Ordinance, including applicable provisions of the MBTA Communities Multi-Family Overlay District, as well as related site plan review and subdivision design standards.

While VHB has identified select areas where additional clarification, documentation, or justification may be required, this review is not intended to represent an exhaustive zoning analysis. The Planning Board, acting as the permit-granting authority, may consider these observations in developing its findings and may grant waivers, impose conditions, or require additional information as it deems appropriate.

### Section XI.V: MBTA Communities Multi-family Overlay District

#### 1. Section XI.V.6.0 Dimensional and Density Requirements.

**(02/25/26) VHB Comment:** The submitted materials do not include a consolidated zoning compliance summary demonstrating conformance with the Dimensional and Density Requirements of the MBTA Communities Multi-Family Overlay District (Section 6.0). While the plans depict proposed building layouts, parking areas, and site improvements, the submission does not clearly document required versus proposed dimensional and density standards necessary to verify compliance.

In addition to building setbacks and height, Section 6.0 governs density, lot coverage, frontage, stories, and other site layout metrics. The submission does not provide:

- Gross and net site area calculations used for density determination
- Units per acre calculations (by neighborhood and overall)
- Building coverage and/or lot coverage calculations
- Open space percentage calculations (if applicable under Section 6.0)
- Frontage compliance calculations
- Maximum building height in both feet and stories
- Tabulated setbacks
- Any bonus density calculations or incentives relied upon (if applicable)

Without a consolidated zoning compliance summary and supporting calculations, the Planning Board cannot make a defensible finding that the project conforms to the Dimensional and Density Requirements of the MBTA Communities Multi-Family Overlay District, nor can it clearly identify whether discretionary relief, bonuses, or zoning deviations are implicated.

VHB recommends that the Planning Board require the Applicant to submit a comprehensive zoning compliance table and supporting calculations summarizing all required versus proposed dimensional and density standards under Section 6.0. This information should be clearly presented within the plan set and/or

narrative and include identification of any standards that do not fully comply and whether Planning Board discretion or other zoning relief is requested.

***MEI Response:** The project, as submitted, complies with the zoning provisions set forth in the Amesbury Zoning Overlay District XI.V – MBTA Communities Multi-Family Overlay District (MFOD). The applicable requirements of this section have been incorporated into Cover Sheet C1.0, including a zoning compliance table for both the North and South Neighborhoods. This section also establishes the required open space standards for the project, which are likewise summarized in the zoning table provided on Cover Sheet C2.0.*

*The project site information, as it applies to these requirements and as presented in the zoning tables on the Cover Sheet, is illustrated on Sheet C4.0 (Overall Key Site Plan). This plan identifies the locations and basis for the yard setbacks, lot coverage, and open space calculations as they relate to the project.*

*Please note that no zoning relief is required, as the project fully complies with the requirements of the MBTA Communities Multi-Family Overlay District (MFOD).*

*The parking is tabulated and provided for each neighborhood and shown on the Site Layout Plans, Sheets C5.0–C5.3, with a table documenting compliance with the MFOD shown on the Cover Sheet.*

**(05/13/26) VHB Response:** The Applicant's response is noted. Based on the revised submission, this comment is considered addressed.

VHB recommends that the Planning Board request that the zoning table be revised to clearly identify the units for building area and open space area values, including percentages where applicable, for clarity.

***MEI Response:** A zoning table with open space calculations has been provided.*

**VHB Response:** The Applicant's response is noted. The requested information has been provided. This comment is considered addressed.

## 2. Section XI.V.7.4 Project Phasing.

**(02/25/26) VHB Comment:** The submitted plans depict the full buildout condition of the project; however, the materials do not clearly identify how the development will be constructed and implemented over time, or whether construction will occur in defined phases. While Section 7.4 of the MBTA Communities Multi-Family Overlay District permits phased development provided that full buildout is shown, it also requires sufficient information to evaluate how site infrastructure and services will function safely and compliantly during interim conditions.

The current submission does not identify:

- The proposed sequence of neighborhood construction (North vs. South or sub-phases within each);
- Which roadways will be constructed and opened during each phase;
- How temporary and permanent stormwater systems will function during partial buildout conditions;
- Whether interim drainage conditions rely on temporary measures;
- How utilities (water, sewer, electric, gas, telecommunications) will be extended and looped during each phase;

- Whether fire access, hydrant spacing, and turning radii will remain compliant at all times;
- How pedestrian routes, ADA access, and parking will function prior to full buildout;
- Whether erosion and sedimentation controls will differ by phase;
- How construction access and staging areas will be accommodated without conflicting with occupied residential areas;
- Whether open space, recreational areas, or trail connections will be available proportionally during each phase;
- How shared infrastructure between neighborhoods will be installed and operational before occupancy; and
- Whether any temporary dead-ends, partial roadway sections, or incomplete utility loops will exist during interim stages.

Without clarification of phasing and interim conditions, the Planning Board cannot determine whether essential services, including stormwater management, emergency access, utilities, snow removal, and internal circulation, will function safely and in compliance with applicable standards during construction and partial occupancy, as required under Section XI.V.7.4.

VHB recommends that the Planning Board require the Applicant to submit a detailed Construction Phasing Plan clearly describing how the project will be implemented over time. The plan should define each proposed phase of construction and identify which roadway, utility, stormwater, and site infrastructure improvements will be installed and operational during each stage. The submission should demonstrate that stormwater systems, drainage patterns, utilities, and internal roadways will function properly under interim buildout conditions and that emergency vehicle access and hydrant coverage will remain compliant throughout construction.

The Applicant should also explain any temporary conditions that may occur during phased development, including temporary dead-ends, partial utility loops, interim drainage configurations, or construction access routes, and describe the measures that will be implemented to ensure public safety and regulatory compliance during those periods. In addition, the phasing plan should clarify how occupancy of buildings will be sequenced relative to completion of required infrastructure and shared systems.

This information is necessary to allow the Planning Board to evaluate both the ultimate buildout condition and the functionality of the site during interim stages of development, consistent with Section XI.V.7.4.

***MEI Response:** Please refer to attached Figure 2.0 for the conceptual approach to project construction. A further detailed construction methodology cannot be finalized until a General Contractor is selected, as the contractor will ultimately determine the means and methods necessary to complete the project in an efficient and cost-effective manner. The provided phasing exhibit is based on discussions with a professional site contractor.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that a conceptual phasing exhibit has now been provided. However, this comment should remain partially outstanding. As noted in VHB's original comment, Section XI.V.7.4 requires sufficient information for the Planning Board to evaluate how site infrastructure and services will function during interim stages of development, not just at full

buildout. While VHB understands that certain construction means and methods will ultimately be determined by the selected General Contractor, the Applicant should still provide sufficient planning-level information to demonstrate that the site can be constructed, stabilized, serviced, accessed, and occupied safely during phased construction.

The submitted conceptual phasing exhibit does not appear to fully address the interim operational and engineering conditions identified in VHB's original comment, including temporary and permanent stormwater management, erosion and sedimentation controls, construction access and staging, utility sequencing, emergency access, hydrant coverage, roadway completion, pedestrian access, and occupancy sequencing. In particular, additional information should be provided regarding how temporary drainage and erosion control measures will function during each phase, including whether temporary sediment basins or other temporary stormwater controls will be required. Where temporary basins are proposed, the Applicant should identify the conceptual approach for those basins, including how adequate separation to groundwater will be maintained and how conflicts with proposed permanent BMPs or areas with limited groundwater separation will be avoided.

As discussed with the Applicant on May 6, 2026, the phasing information should also clarify how construction vehicle tracking, truck cleaning, and sediment migration onto Elm Street and internal roadways will be controlled during earthwork and utility installation. The Applicant should further clarify how roadways, utilities, fire access, hydrants, and turning movements will remain functional during each phase, how construction access and staging areas will be separated from occupied residential areas, and how occupancy of buildings will be sequenced relative to completion of required roadway, utility, stormwater, and emergency access infrastructure.

VHB also recommends that the Applicant address roadway construction sequencing, including how pavement base course areas used during construction will be evaluated and replaced or reconstructed as necessary prior to final roadway completion. This is particularly important where partially constructed roadways may be used for construction traffic prior to acceptance or final surface course placement.

VHB recommends that the Applicant provide an updated phasing plan and accompanying narrative addressing these items. The intent is not to require final contractor means and methods at this stage, but to demonstrate that it has built in flexibility so that it can maintain stormwater management, erosion control, access, utilities, public safety, and site stabilization throughout construction and partial occupancy conditions.

***MEI Response:** Applicant will supplement this submission with a general construction sequencing plan which will indicate how Applicant intends to occupy buildings and safely separate construction activity from occupancy. Applicant recognizes that a more detailed construction management plan (CMP) will be a condition of approval subject to the review of the Planning Department, Building Department, Fire, Police and DPW staff prior to the commencement of construction.*

**VHB Response:** The Applicant indicates that a general construction sequencing plan will supplement the submission; however, the referenced plan does not appear to have been provided with the current submission. This comment remains outstanding pending review of that information.

**VHB recommends that the Applicant provide the proposed general construction sequencing plan addressing building occupancy, separation of construction activities from occupied areas, and the sequencing of required access, utilities, stormwater infrastructure, and emergency services. A more**

**detailed Construction Management Plan may be required as a condition of approval prior to construction.**

### Section XI.Q.10.5 Development and Performance Standards

Pursuant to Section XI.V.7.5, projects within the MFOD are subject to the Site Plan Review Design Standards set forth in Section XI.Q.10.5, except as modified by Section 9.0. For projects within the RH-MFOD, Section 9.4.1 exempts certain subsections of Section XI.Q.10.5 (including 10.5.e and 10.5.n) and instead requires conformance with the approved RH-MFOD Residential Pattern Book and applicable sign provisions.

Accordingly, the proposed development is subject to the applicable provisions of Section XI.Q.10.5, as modified by Section 9.0 for the RH-MFOD, and the comments below evaluate compliance within that framework.

#### 1. XI.Q.10.5.a.3. Pedestrian and Bicycle Circulation.

**(02/25/26) VHB Comment:** The submitted plans demonstrate an internal sidewalk and pedestrian path network; however, bicycle circulation and accommodation are not clearly defined or substantiated. While the project connects to Elm Street (which contains an existing bicycle lane), the internal neighborhood streets do not appear to include designated bicycle facilities, shared roadway treatments, traffic-calming details specific to bicycle safety, or clearly defined connections to nearby regional trail systems.

Given the site's proximity to established bicycle infrastructure (including the Powow and Ghost Trail networks), the apparent absence of internal bicycle-supportive design elements represents a significant limitation in meeting the stated intent of Section 10.5.a.3. The materials do not identify:

- Designated bicycle routes within the development
- Shared-use roadway design criteria or traffic-calming measures that support safe bicycle travel
- Direct, signed, or enhanced connections to nearby regional trail systems
- Bicycle parking or long-term storage facilities (resident or visitor)
- Bicycle storage within multifamily buildings
- Bicycle racks at community buildings, open space areas, or trail access points

Without this information, it is not possible to determine whether the project meaningfully encourages bicycle travel as required by Section 10.5.a.3.

VHB recommends that the Planning Board require the Applicant to submit a comprehensive Bicycle Circulation and Accommodation Plan demonstrating how bicycle travel is supported within and beyond the site. At a minimum, the submission should include:

- Identification of internal bicycle routes (designated or shared-use)
- Design speeds and roadway widths demonstrating bicycle compatibility
- Wayfinding signage and trail connectivity details
- Quantified bicycle parking and long-term storage counts (resident and visitor)

- Bicycle rack details and locations at community buildings and public open spaces
- Direct and safe connections to nearby regional trail systems

If the Applicant does not intend to provide dedicated bicycle facilities, supporting analysis must be provided demonstrating how the project otherwise satisfies the bicycle circulation objectives of Section 10.5.a.3, particularly given its proximity to regional trail infrastructure.

*MEI Response: The project has direct and safe connections to both the Ghost Trail and Amesbury Riverwalk Trails via the designated bike lanes on Elm Street. This portion of Elm Street and these bike lanes have been identified by the City of Amesbury as the connection between these two trail systems. The City has partnered with the State to enhance this connection by extending the Riverwalk Trail to Elm Street through the Carriage Town shopping center and adding a signalized crossing at the Carriage Town entrance on Elm Street. The City anticipates construction of these improvements in 2028. Similarly, proposed Rock-Hill off-site improvements include the addition of a signalized crosswalk at the existing crosswalk just north of the proposed neighborhood entrance. This frontage on the Ghost Trail/Riverwalk connector will be featured in project marketing, leasing, and home-owner material. Wayfinding signage will be provided on-site direction.*

*All internal roadways will be shared-use with all posted speeds under 25 mph. Project signage will caution vehicular use and prioritize pedestrian and bicycle safety. Roadways widths and streetscape design were calibrated within the Design Guidelines to limit vehicular speed and fit the particulars of this site. Significantly, the project will experience no true through-traffic or the challenges it can present. Passage through the south neighborhood to the north is the one area where the dynamics of through traffic could be present. For that reason, the boulevard configuration was selected and the rotary intersection incorporated.*

*Bicycle storage – Shown on the updated Landscape plans:*

- *Short-term parking is provided with outdoor racks at the north and south neighborhood clubhouses, the fieldhouse/pool complex, and at the trail parking area on the north side of the rotary and at the north neighborhood park opposite Bldg #19. Plans and details updated accordingly.*
- *Bicycle storage in the North Neighborhood is provided within the freestanding garages (G5, G12, & G17). Outfitted with storage racking systems, these garages will provide for a total of 90+ bicycles. Parking counts for the North Neighborhood have been updated to remove three garages. South neighborhood homes each have a 2-stall garage for interior storage. Plans and details have been updated accordingly.*

**(05/13/26) VHB Response:** The Applicant's response is noted. Based on the revised submission, this comment is considered substantially addressed. The Applicant has clarified that internal roadways are intended to function as shared-use streets with posted speeds under 25 mph and has added bicycle parking/storage information to the revised plans, including bike rack locations at community amenities and trail access areas and identified bike storage within the North Neighborhood garage buildings.

For clarity, VHB recommends that any proposed wayfinding signage referenced in the response be reflected on the plan set or included in the project signage package, as applicable.

*MEI Response: The Applicant has provided a sign plan showing wayfaring signage and proposed locations.*

**VHB Response:** The Applicant's response is noted. The revised plan set identifies the proposed wayfinding signage and locations. This comment is considered addressed.

2. XI.Q.10.5.a.5 Private Road Construction.

**(02/25/26) VHB Comment:** The proposed development includes private on-site roadways, and the submitted plans provide roadway layouts, widths, and general construction details for these facilities. However, the materials do not clearly document full conformance with all applicable provisions, including confirmation of dedication status, easements for utilities and public improvements, and long-term responsibility for private roadway maintenance.

Without clear documentation of private roadway status, easements, and long-term ownership and maintenance responsibilities, the Planning Board cannot ensure that the proposed private roads will be legally established, properly maintained, and adequately support public safety and utility access over the life of the development.

VHB recommends that the Planning Board require the Applicant to clarify and document conformance with Section 5 – Private Road Construction, including identification of private roadway status, applicable easements, and long-term ownership and maintenance responsibilities, in addition to the roadway design information already provided.

*MEI Response: Please note that the project roadway and layout requirements have been established in accordance with the roadway design standards set forth in the Residential Pattern Book. Typical roadway sections for the boulevard, neighborhood streets, and parking lanes are included in that document and form the basis of the project design.*

*A Definitive Subdivision Plan "Lotting Plan" consisting of two drawings is included with the updated plan set, illustrating one parcel for the North Neighborhood and two parcels for the South Neighborhood. The main boulevard is intended to be accepted as a public way from Elm Street to the end of the divided boulevard, including the small parking lot with public access to the trail network. The roadways within the North Neighborhood will be privately owned and maintained by the respective property owner, while the neighborhood roads within the two parcels comprising the South Neighborhood will be privately owned and maintained by the South Neighborhood Homeowners' Association.*

*As the project advances, the applicant will coordinate with the Amesbury Office of Community Development to prepare the required legal documents.*

*Please refer to the subdivision plan provided for the proposed land areas associated with the North and South Neighborhoods. The proposed lots are also depicted on Sheet C4.0 (Overall Key Site Plan).*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that the revised submission now clarifies the intended roadway ownership framework, including that the main boulevard is proposed for public acceptance, the North Neighborhood roads are to remain privately owned and maintained, and the South Neighborhood roads are to be privately owned and maintained by the South Neighborhood Homeowners' Association.

However, this comment should remain partially outstanding, as the response indicates that the required legal documents and related coordination with the City will occur as the project advances. While the revised submission provides additional clarification regarding intended ownership and maintenance, the Planning Board may still wish to confirm that the necessary easements, roadway status, and long-term maintenance responsibilities are formally documented as part of the approval process.

VHB recommends that, if the Planning Board determines that the Applicant's explanation is adequate for purposes of Site Plan Review, any approval should be conditioned on the Applicant submitting final documentation establishing private roadway status, applicable easements, public/private ownership limits, and long-term ownership and maintenance responsibilities for review by the City prior to endorsement or occupancy, as applicable. To the extent the proposed ownership or maintenance framework requires relief from any applicable zoning or subdivision standard, the Applicant should identify the applicable requirement and formally request a waiver or other relief for Planning Board consideration.

*MEI Response: The Applicant intends to soon submit an application for Definitive Subdivision Approval consistent with the proposed lot plan included with this application. The Definitive Subdivision application will include descriptions of public/private ownership limits, applicable easements, and long-term ownership and maintenance responsibilities.*

**VHB Response:** The Applicant's response is noted. The proposed roadway ownership limits, easements, and maintenance responsibilities will be addressed through the forthcoming Definitive Subdivision application. This comment remains partially outstanding pending submission and review of that documentation.

**VHB recommends that the Applicant provide the Definitive Subdivision materials identifying the public and private roadway limits, applicable easements, and long-term ownership and maintenance responsibilities for review by the City.**

**Per Section XI.Q.10.5.a.5(f) & (g) Subdivision Rules and Regulations**

1. 2.02

The project site appears to have historically consisted of multiple lots, which are now shown as a single consolidated parcel on the current plans. The submission does not clearly indicate whether these lots have been formally merged for zoning and record purposes.

While the project is not currently before the Planning Board as a Definitive Subdivision, the legal configuration of the parcel is relevant to the Board's ability to make zoning findings under the MBTA Communities Multi-Family Overlay District, including frontage, setback, lot area, and density calculations. If multiple lots remain of record, clarification is necessary as to how dimensional requirements are being applied.

Without confirmation of the parcel's legal status, the Planning Board cannot verify that zoning dimensional standards are being calculated based on a legally recognized lot configuration.

VHB recommends that the Planning Board request that the Applicant clarify the current legal status of the project parcels. If the lots have been consolidated, the Applicant should provide documentation (e.g., recording information or endorsed plan) confirming such consolidation. If the lots remain separate, the Applicant should explain how zoning compliance calculations are being applied and whether any further action is anticipated to formalize the lot configuration.

*MEI Response: The existing project parcel boundaries are shown on the Survey Boundary Plans (Sheets C0.0–C0.3). These plans have been prepared and certified by a Massachusetts Professional Land Surveyor and include all applicable deed references for the project parcels.*

*A proposed Definitive Subdivision Plan has been provided to establish the parcel configuration for the North and South Neighborhoods. This plan also identifies the proposed public right-of-way associated with the project.*

*The proposed lots are in conformance with the requirements of the MBTA Communities Multi-Family Overlay District (MFOD).*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that the revised submission includes the existing parcel boundaries on the Survey Boundary Plans and a proposed Definitive Subdivision Plan identifying the intended future lot configuration and proposed public right-of-way.

However, this comment should remain partially outstanding. The response clarifies the Applicant's intended future parcel configuration, but does not demonstrate that the existing parcels have been formally consolidated or that the proposed subdivision plan has been recorded. VHB understands that the project site currently consists of multiple existing lots/parcels and that those parcels must either be consolidated or otherwise legally configured to support the proposed site plan, zoning calculations, ownership framework, and proposed public right-of-way.

Based on the Applicant's response, if the proposed Site Plan is relying on the future lot configuration shown on the Definitive Subdivision Plan, the Site Plan approval should not become final, and construction should not commence, until the Definitive Subdivision Plan has been endorsed and recorded. If the Definitive Subdivision Plan is not recorded prior to construction, the Applicant should be required to submit other appropriate legal documentation, such as a lot consolidation plan or equivalent recordable instrument, confirming the legal lot configuration that will govern the project.

VHB recommends that any approval be conditioned on the Applicant providing final documentation confirming the lot configuration provides legal frontage as required for zoning and record purposes prior to commencement of construction. This documentation should include either the recorded Definitive Subdivision Plan or other legal documentation acceptable to the City confirming consolidation or configuration of the existing parcels.

*MEI Response:* As noted above, the Applicant is willing to accept as a condition to RH-MFOD Site Plan Approval a requirement to obtain Definitive Subdivision Approval for the Project. The Applicant has provided with this application a plan of the proposed lots.

**VHB Response: The Applicant's agreement to obtain Definitive Subdivision Approval is noted. This comment is considered addressed with a condition. The proposed Site Plan relies on the future lot configuration and public right-of-way shown on the Definitive Subdivision Plan. Accordingly, the final decision should require the Definitive Subdivision Plan, or other recordable instrument acceptable to the City establishing the required lot configuration, frontage, ownership limits, and rights-of-way, to be endorsed and recorded prior to commencement of construction or issuance of any building permit dependent on that configuration.**

## 2. 6.04 Environmental and Community Impact Analysis

**(02/25/26) VHB Comment:** Section 6.04 of the Subdivision Rules and Regulations requires submission of an Environmental and Community Impact Analysis for residential subdivisions creating over 15 lots and authorizes the Planning Board to require portions of such analysis for smaller subdivisions where, in its opinion, the sensitivity of the land warrants further investigation.

Given the scale of the proposed development and the presence of regulated wetlands and riverfront areas, slopes, stormwater infrastructure, access trails, private roadways, and potential impacts to traffic, utilities, and

municipal services, the submitted materials do not clearly indicate whether an Environmental and Community Impact Analysis or portions thereof has been prepared consistent with Section 6.04. While various components (e.g., traffic analysis, stormwater report, narrative) have been provided separately, the submission does not appear to consolidate these topics into a structured analysis addressing the categories identified in Section 6.04, including environmental impacts, public services, traffic impacts, and compatibility with surrounding land uses.

Without a consolidated Environmental and Community Impact Analysis consistent with Section 6.04, the Planning Board lacks a structured basis to evaluate the cumulative environmental, infrastructure, traffic, and community service impacts of the project in a manner contemplated by the Subdivision Rules and Regulations.

VHB recommends that the Planning Board should require the Applicant to submit a consolidated Environmental and Community Impact Analysis addressing the applicable elements of Section 6.04 of the Subdivision Rules and Regulations for review and consideration prior to approval.

*MEI Response: As confirmed at the Planning Board Hearing on 3/9/2026, the Applicant's MEPA Final Environmental Impact Report will suffice for the requested Environmental and Community Impact Analysis.*

*During the 3/9/2026 Planning Board hearing, a Planning Board Member inquired about traffic impacts during construction of the project. The Applicant has discussed the subject with their General Contractor and confirmed that during the peak of construction, an estimated 45–75 contractor cars and trucks will visit the site daily, primarily arriving from 6:30 AM to 8:00 AM and exiting the site from 3:30 PM to 5:00 PM. This is substantially fewer vehicles than the traffic counts estimated during occupancy, and much of it will be earlier than peak morning and evening hours.*

*During the 3 to 4 months when fill is being delivered in the early months of construction, an estimated additional 30 to 50 trucks per day will be expected. This traffic will be dispersed throughout the day.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB understands, based on the Applicant's response, that the Planning Board discussed this issue at the March 9, 2026 hearing and may consider the MEPA Final Environmental Impact Report sufficient to address the intent of the Environmental and Community Impact Analysis referenced in Section 6.04.

If the Applicant intends to rely on the MEPA FEIR and other submitted materials in lieu of a standalone Environmental and Community Impact Analysis under Section 6.04, VHB recommends that the Applicant clearly identify for the Board that approach and provide a brief explanation demonstrating how the applicable Section 6.04 topics are addressed in this FEIR, or otherwise request appropriate relief for Planning Board consideration.

*MEI Response: As stated in Applicant's 3/25/26 response, the Planning Board determined at the 3/9/26 Planning Board meeting that the Applicant's MEPA FEIR report will suffice for purposes of environmental review and the requirements of 6.04 Environmental and Community Impact Analysis.*

**VHB Response:** The Applicant's response is noted. Based on the Planning Board's determination that the MEPA Final Environmental Impact Report satisfies the requirements of Section 6.04, this comment is considered addressed.

4. 7.09.H Pedestrian and Bicycle Paths.

**(02/25/26) VHB Comment:** The submitted plans depict raised crosswalks at select locations; however, the plans do not include a typical crosswalk detail identifying surface materials. Section 7.09.H allows the Planning Board to require crosswalks constructed of textured or stamped concrete/pavement or brick pavers with granite edging, and it is unclear whether the proposed raised crosswalks are intended to meet these material and edge treatment standards, as the detail currently shows pavement only.

In addition, the plans do not propose any public bicycle paths within the development. As noted in the prior comment regarding bicycle circulation, it is unclear how bicycle connectivity is being addressed within the site or to adjacent facilities, consistent with the intent of Section 7.09.H.

Without detailed crosswalk material specifications and clarification of bicycle path provisions, the Planning Board cannot determine whether the project satisfies the pedestrian safety, material quality, and bicycle connectivity objectives of Section 7.09.H.

VHB recommends that the Planning Board require the Applicant to provide a typical crosswalk detail identifying proposed materials and edge treatments to demonstrate consistency with Section 7.09.H. In addition, the Applicant should clarify whether any bicycle paths are proposed within the development or provide supporting justification, by reference to the previously noted bicycle circulation comment under Section XI.Q.10.5.a.3, demonstrating how the project satisfies the pedestrian and bicycle connectivity objectives of Section 7.09.H.

***MEI Response:** Note that raised crosswalks and colored imprinted surfaces are provided at locations for traffic calming and pedestrian safety. Details for these sidewalks are provided on Sheet 10.0.*

*Please note the project design follows the parameters set in the Design Guidebook for the project. The guidebook was carefully crafted by the City Planning Staff and Planning Board considering the global vehicle, bicycle, and pedestrian circulation.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges the clarification that raised crosswalks with colored imprinted surfaces are proposed and that details are provided on Sheet 10.0. To that extent, the crosswalk material portion of this comment is considered addressed.

With respect to bicycle paths, VHB acknowledges the Applicant's statement that the project design is based on the Design Guidebook and broader circulation framework. As noted in VHB's prior bicycle circulation comment, the Planning Board should determine whether the proposed shared roadway and off-site trail connection approach is sufficient to satisfy the intent of Section 7.09.H.

VHB recommends that the Applicant identify any proposed crosswalk materials, edge treatments, or bicycle circulation improvements that differ from the standards contemplated under Section 7.09.H. To the extent deviations are proposed, the Applicant should formally request a waiver and provide supporting justification for Planning Board consideration.

***MEI Response:** There are several raised crosswalks proposed throughout the project area. Those are labeled on the site layout sheet with the materials specified on the detail sheets. All other crosswalks in the roadways will be textured paved surface, and internal parking crosswalks are proposed as painted. The roadway sections are designed in accordance with the Rocky Hill Design Guidelines.*

**VHB Response:** The Applicant's response is noted. The revised plans identify the proposed crosswalk types and materials, including stamped brick-pattern pavement for roadway crosswalks and painted crosswalks within parking areas. Based on the revised submission, this comment is considered addressed.

5. 7.10.B. Design Basis.

**(02/25/26) VHB Comment:** See Stormwater Management Section Below.

6. 7.10.B.1 Use Low Impact Development (LID) site planning and design strategies unless infeasible;

**(02/25/26) VHB Comment:** See Stormwater Management Section Below.

7. 7.10.B.3 Stormwater management systems

**(02/25/26) VHB Comment:** See Stormwater Management Section Below.

8. 7.15 Earth Removal.

**(02/25/26) VHB Comment:** The submitted grading plans depict substantial areas of cut and fill throughout the site; however, the materials do not include a quantitative earthwork summary (cut/fill calculations or balance analysis), nor do they clearly indicate whether material will be exported from or imported to the site. While the project is not before the Board as a Definitive Subdivision, Section XI.Q.10.5.a.5 incorporates applicable Subdivision standards for purposes of Site Plan Review, and earthwork magnitude is relevant to evaluating grading impacts, site stability, and community effects.

Without a quantified earthwork analysis, the Planning Board cannot determine the scale of material movement proposed, whether the project is balanced on-site, or what off-site trucking activity may be required. This information is necessary to assess potential impacts to surrounding roadways, traffic operations, neighborhood disturbance, construction duration, and environmental conditions.

In addition, the grading plans do not include representative site cross sections or other graphics that would allow the Board to clearly understand the magnitude of vertical change across the site, particularly in areas of significant fill or cut adjacent to property boundaries or resource areas.

VHB recommends that the Planning Board request that the Applicant provide:

- A detailed earthwork analysis summarizing total cut, total fill, and net import/export quantities;
- Identification of whether material will be removed from or brought onto the site;
- An estimate of anticipated truck trips associated with earthwork import/export (including approximate daily truck volumes and duration);
- Representative site cross sections or other grading graphics illustrating the extent of cut and fill in key locations; and
- Clarification of any potential off-site staging, stockpiling, or hauling routes associated with earth removal.

This information will allow the Planning Board to better understand the scale of grading operations, evaluate potential community and traffic impacts, and make informed findings under Site Plan Review.

***MEI Response:** The project will require the import of soil due to existing site and groundwater conditions. Fortunately, Interstate 95 and Interstate 495 are located in proximity to the site, allowing the haul route to access the project directly from these major interstates via Route 110. This haul route avoids residential neighborhoods and school zones.*

*It is estimated that the site filling operations will be completed over a period of approximately four months, with approximately fifty (50) truck trips per day.*

*Please refer to Exhibits 1.0 and 1.1 for the detailed cut and fill analysis, including total quantities associated with the project. The exhibit also illustrates the proposed haul route.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that the revised submission now includes a cut and fill analysis, identifies that material will be imported to the site, provides an estimated duration and daily truck volume for filling operations, and identifies the proposed haul route.

However, this comment should remain partially outstanding. The proposed project appears to rely on a substantial amount of imported fill to establish the proposed grading, roadway, building, utility, and stormwater design. Given the magnitude of fill and the site's groundwater constraints, the Applicant should provide sufficient engineering documentation prior to construction to demonstrate that the proposed fill program will not adversely affect site stability, stormwater performance, runoff patterns, groundwater separation, drainage infrastructure, utilities, or adjacent properties. This should include appropriate geotechnical evaluation, fill material specifications, compaction and testing requirements, subgrade preparation, and confirmation that the stormwater and utility designs remain valid under the proposed fill conditions.

The Applicant should also clarify how the estimated 50 truck trips per day was calculated, including the assumed import quantity, truck capacity, number of working days, and whether the estimate accounts for all earthwork-related trucking activity, including topsoil stripping, unsuitable material removal, export of excess material, aggregate import, or other construction materials. In addition, because the proposed haul route relies on Route 110 and Elm Street, and VHB understands from City staff that the Route 110 / Elm Street area may be subject to MassDOT-related construction activity, the Applicant should coordinate the haul route, potential alternate routes, construction timing, and traffic management measures with the City, MassDOT, and DPW.

VHB recommends that the Applicant provide supplemental engineering documentation addressing the proposed fill program and a revised construction trucking estimate prior to the start of construction. These items should be resolved through the engineering review process and should not be deferred solely to contractor means and methods.

***MEI Response:** The Applicant's general contractor estimates that the site filling operations will be completed over a period of approximately four months, with approximately fifty (50) truck trips per day. Applicant has provided exhibits including a detailed cut and fill analysis which includes total fill quantities associated with the project. The exhibit also illustrates the proposed haul route. A more detailed operational plan will be incorporated into the Construction Management Plan noted above, providing additional details on the management of earth operations.*

**VHB Response:** The Applicant's response is noted. The latest submission does not appear to include updated earthwork calculations, a revised construction trucking estimate, or a detailed earthwork operational plan. The Applicant indicates that additional earthwork management information will be provided in a future Construction Management Plan. This comment remains partially outstanding.

**VHB recommends that the Applicant provide, prior to commencement of construction, a Construction Management Plan addressing soil import quantities, anticipated truck volumes and duration, haul routes, traffic controls, fill specifications, placement and compaction requirements, testing and inspection procedures, and coordination with the City, MassDOT and DPW, as applicable.**

#### Section XI.Q.10.5 Development and Performance Standards (Continued)

Pursuant to Section XI.V.7.5, projects within the MFOD are subject to the Site Plan Review Design Standards set forth in Section XI.Q.10.5, except as modified by Section 9.0. For projects within the RH-MFOD, Section 9.4.1 exempts certain subsections of Section XI.Q.10.5 (including 10.5.e and 10.5.n) and instead requires conformance with the approved RH-MFOD Residential Pattern Book and applicable sign provisions.

Accordingly, the proposed development is subject to the applicable provisions of Section XI.Q.10.5, as modified by Section 9.0 for the RH-MFOD, and the comments below evaluate compliance within that framework.

##### 1. XI.Q.10.5.b. Parking.

**(02/25/26) VHB Comment:** The Applicant's narrative states that parking is proposed at approximately 2.87 spaces per dwelling unit in the South Neighborhood and 1.68 spaces per dwelling unit in the North Neighborhood, exclusive of parking dedicated to public trail access. Section 10.b.1 requires a minimum of 1.5 spaces per dwelling unit and establishes a maximum of 1.75 spaces per dwelling unit unless otherwise approved by the Permit Approval Authority (PAA). The submission does not clearly demonstrate how the proposed parking supply complies with these limits or whether approval for parking in excess of the maximum is being requested.

Without a clear parking compliance summary, the Planning Board cannot determine whether the proposed parking supply conforms to the minimum and maximum ratios established under Section XI.Q.10.5.b or whether discretionary approval for excess parking is required.

VHB recommends that the Planning Board require the Applicant to provide a parking compliance summary documenting the required minimum and maximum parking pursuant to Section 10.b, the proposed parking by neighborhood and use, and to clearly identify and justify any parking proposed in excess of the maximum ratio for Planning Board review and approval, as applicable.

***MEI Response:** Parking configurations and counts for both neighborhoods are a function of the Design Guidelines, which prioritize streetscapes lined with trees and front porches, and near or abutting parking. Driveway layouts and street widths were set to prohibit parking except in designated bump-out areas to ensure that, to the fullest extent possible, reported parking counts equal actual parking capacity. This matters because parking counts are typically blind to tandem and other unmarked spaces. For the North Neighborhood, where unassigned surface parking predominates, parking distribution and ratios are within the zoning guidelines as noted. Spaces are distributed evenly across the site proximate to building entrances.*

*In the South Neighborhood, primary homeowner parking is in attached single and two-car garages, with an additional 79 guest parking spaces distributed around the neighborhood (including spaces at the community building and trail access area north of the rotary). With one exception noted below, these parking counts are the sum total within the South Neighborhood. In many site plans, this number of guest spaces would be excessive because homes with garages typically have driveways with at least one tandem space per stall. However, in this case, the garages of 72 of the 83 homes are accessed via shared driveways, not private driveways. These shared driveways do not accommodate tandem parking. The guest parking spaces have been located to serve these homes. The exceptions are the eleven free-standing homes that do have street-facing garages. These homes are grouped in three clusters, and accordingly, common guest parking spaces have not been located nearest to these homes.*

*Therefore, whereas a conventional plan may have a functional parking capacity of two or more times quantified spaces, the proposed plan, by applying the Design Guidelines, contains a modest allowance of less than one unassigned space per home. Without these spaces equitably distributed across the neighborhood, the daily life of residents and their guests would be severely compromised, along with delivery and service functions.*

*The for-sale units in the South Neighborhood each contain three or four bedrooms. A minimum of two parking spaces per unit is more appropriate for this portion of the project. A detailed summary of the provided parking is now tabulated and provided on the Cover Sheet C1.0 and Site Layout Plans, Sheets C5.0–C5.3.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that the revised submission now includes a more detailed parking summary on the cover sheet and site layout plans and provides additional explanation regarding the functional parking needs of the South Neighborhood.

However, this comment should remain partially outstanding. Based on the Applicant's response and revised parking summary, the North Neighborhood appears to fall within the stated parking ratio limits, but the South Neighborhood still appears to exceed the maximum parking ratio set forth in Section XI.Q.10.5.b. While the Applicant has provided justification for that parking supply based on unit type, garage access configuration, and guest parking needs, the response confirms that parking in excess of the stated maximum is still proposed.

In addition, VHB notes that several proposed driveways appear to be approximately 20 feet in length and may function as additional parking spaces beyond those formally counted in the parking summary. The Applicant should clarify whether these driveway areas are intended or permitted to be used for vehicle parking and, if so, whether they have been included in the parking calculations. Where driveway parking is proposed, the Applicant should also demonstrate that parked vehicles can be accommodated without overhanging into adjacent drive aisles, sidewalks, landscaped areas, or other circulation routes.

VHB recommends that the Applicant formally identify the South Neighborhood parking supply as a request for Planning Board approval or relief from the maximum parking ratio under Section XI.Q.10.5.b, including supporting justification for the proposed parking count and clarification of whether driveway areas are intended to function as additional parking spaces.

**MEI Response:** *The proposed South Neighborhood parking supply is as follows:*

- *Garage Spaces = 154. Seventy-one homes will have two-stall garages (142 parking spaces) and twelve homes will have a single-stall garage (12 parking spaces).*

- *Parallel Spaces Along Boulevard and Internal Streets = 46. The parallel spaces are the only true guest and overflow parking available within the South Neighborhood. The spaces are intentionally dispersed for convenience to each cluster of homes and will also serve deliveries, move-ins, and other purposes. The Applicant has greatly reduced the number of surface parking spaces through the Design Review Committee process and eliminated another 19 spaces from the last version of the plan to reduce impacts within regulated buffers. The Applicant believes that 46 guest and overflow parking spaces is not an excessive number for a community of 83 homes and is in keeping with the streetscape intent of the Rocky Hill Design Guidelines ("On-street parking is encouraged where possible for convenience and to provide a comfortable distance from passing traffic for pedestrians." Page 12 of the Rocky Hill Neighborhood Pattern Book).*
- *Clubhouse Spaces = 3 spaces adjacent to the clubhouse, including one accessible parking space.*
- *A Note About Driveways: Only the single-family homes include a driveway sufficiently sized for parking. All other driveways serving alley-loaded garages have been reduced to 8' or less in length, sufficient enough for a necessary turning radius but not long enough to encourage parking. It will be up to the Homeowners' Association to ensure that the alleys are not blocked by parked vehicles.*

**VHB Response:** The Applicant's response is noted. The revised parking summary identifies 203 counted parking spaces for 83 dwelling units in the South Neighborhood, or approximately 2.45 spaces per unit, which exceeds the maximum ratio of 1.75 spaces per unit established by Section XI.Q.10.5.b. The response clarifies that the short alley-loaded driveways are not intended for parking; however, the detached single-family homes include driveways sufficiently sized to accommodate vehicles, and those functional parking spaces do not appear to be included in the reported total. Accordingly, the actual South Neighborhood parking supply may exceed 203 spaces. This comment remains partially outstanding.

**VHB recommends that the Applicant quantify all driveway spaces that can physically and legally accommodate a vehicle, include those spaces in the final parking calculation, and demonstrate that parked vehicles will not obstruct sidewalks, shared alleys, garage access, landscaping, or roadway circulation. The Applicant should also formally request Planning Board approval for the final South Neighborhood parking supply in excess of the maximum permitted ratio.**

2. XI.Q.10.5.b.4.e. Location of Parking.

**(02/25/26) VHB Comment:** Section 10.5.b.4.e of the Zoning Ordinance requires that off-street parking areas, access ways, and maneuvering areas be designed to provide adequate drainage, snow removal, and maneuverability, including accommodation of loading and service functions without conflict with site circulation. The submitted plans do not identify any designated loading spaces or loading areas, and the materials do not clearly indicate how routine deliveries or residential move-in/move-out operations will be accommodated for the proposed buildings.

Without designated loading provisions and operational details for deliveries, move-in/move-out activity, and snow management, the Planning Board cannot determine whether the parking and circulation layout will function safely and efficiently without conflicts to emergency access or internal traffic flow, as required under Section XI.Q.10.5.b.4.e.

VHB recommends that the Planning Board require the Applicant to clarify how deliveries and move-in/move-out operations will be accommodated for each building and to demonstrate that the proposed site layout

provides adequate maneuverability consistent with Section 10.5.b.4.e. If loading activities are intended to occur within shared circulation areas, the Applicant should provide supporting information demonstrating that such operations will not conflict with vehicular circulation or emergency access. The Applicant should also identify how snow removal and snow storage will be managed to ensure that required maneuvering areas, access routes, and emergency access are maintained during winter conditions.

*MEI Response: The North Neighborhood's community clubhouse includes a mailroom and a package room where all mail and package deliveries will be made for the rental community. The mail and package rooms will be managed by the onsite property management team. Adequate temporary parking is available immediately adjacent to the clubhouse for mail and package deliveries.*

*Move-ins for the North Neighborhood will be coordinated and managed by the onsite property management and maintenance teams. Given the limited size of the rental apartments, smaller moving vans are the norm for buildings of this kind. The onsite management team will impose time restrictions, manage moving company certificates of insurance, and coordinate the logistics of the move-in and move-out processes.*

*The South Neighborhood's clubhouse includes a mailroom. Parking is available immediately adjacent to the clubhouse for mail delivery. Package deliveries for the South Neighborhood will be made door-to-door, as is typical of residential neighborhoods.*

*Each home in the South Neighborhood has its own driveway or a rear drive aisle off of the main circulatory streets, providing sufficient temporary parking for moving vehicles outside of the primary and emergency access routes. Loading is not intended to take place in shared circulation areas.*

*Snow storage areas have been added to the Site Layout Plans, Sheets 5.0–5.3. The 6-foot landscaped strip will provide snow storage for normal roadway plowing operations.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges the additional clarification regarding mail and package delivery, move-in and move-out operations, and the addition of snow storage areas on the revised Site Layout Plans.

This comment should remain partially outstanding. Although snow storage areas have been identified, the submission does not clearly document the basis for the proposed snow storage capacity, including the available storage area/volume, calculation methodology, or assumptions used to determine adequacy. VHB also notes that portions of the proposed 6-foot landscaped strip identified for snow storage appear to contain proposed trees, which may reduce usable snow storage capacity and create long-term maintenance conflicts.

VHB recommends that the Applicant provide a snow storage plan or figure that clearly identifies designated snow storage areas and demonstrates that adequate capacity is available without conflict with proposed landscaping, parking, maneuvering areas, access routes, sidewalks, accessible routes, utilities, stormwater infrastructure, or emergency access. VHB also recommends that the Planning Board confirm it is satisfied with the proposed operational approach for deliveries and move-in/move-out coordination, particularly for the North Neighborhood multifamily buildings.

*MEI Response: Potential snow storage areas are shown on the Site Layout Plans. Ample open space has been provided throughout the development for snow storage. In particular, the proposed public boulevard includes an 8-foot-wide center island and a 5-foot-wide landscaped area between the edge of the roadway and the sidewalk.*

*The landscaping within these areas has been designed with the expectation that they will serve as snow storage areas during winter maintenance operations.*

*These areas provide sufficient capacity to accommodate snow generated by potential DPW plowing operations. All other roadways and common areas will be privately maintained by a property management company, which will remove snow from the site as necessary during extreme winter conditions.*

*A Snow Storage Plan and supporting calculations have been provided for the two interior driveways within the South Neighborhood. Due to the separate ownership of the dwelling units and the close proximity of the buildings in this area, we believe these driveways are the only locations that warrant this level of detailed snow storage analysis.*

**VHB Response:** The Applicant's response is noted. The latest submission identifies potential snow storage areas throughout the development and includes supporting calculations for the two interior South Neighborhood driveways. However, calculations have not been provided for the remaining roadways and parking areas, and the Applicant proposes off-site snow removal during larger winter events.

**VHB recommends that the Planning Board determine whether the proposed snow storage and off-site removal approach is sufficient. If the Board finds the approach acceptable, any approval should require a final snow management plan coordinated with the Amesbury DPW for public roadway areas and confirmation from the property management company or snow-removal contractor that off-site removal services and disposal capacity will be available when required.**

3. XI.Q.10.5.d. Open Space.

**(02/25/26) VHB Comment:** The Applicant's narrative describes preservation of natural areas, interconnected open space, and permanent protection through deed restrictions. However, the submitted materials do not clearly delineate the specific limits of common open space proposed for permanent protection, nor do they identify which areas, if any, are proposed to be deeded to the public versus retained under private ownership. In addition, the submission does not clearly identify the entity responsible for long-term ownership, maintenance, and operation of these areas, as required under Section 10.5.d – Open Space.

The project includes numerous privately owned and maintained elements, including stormwater BMPs, internal roads, sidewalks, lighting, trails, and landscaped areas, many of which appear to be located within or adjacent to areas described as "open space." The plans do not clearly distinguish between passive natural open space, active recreational areas, stormwater management areas, and landscaped buffers, nor do they clarify which stormwater BMPs are located within designated open space areas. Without this distinction, it is unclear how the open space requirement is being calculated and how such areas will function over time.

In addition, while the plans depict an internal trail and path network, the materials do not explain the planning logic behind the layout, including how the proposed paths connect to civic, recreational, or natural areas within the development and whether they provide meaningful connectivity between neighborhoods or to adjacent resources.

Without clearly delineated open space limits, identification of areas proposed for public dedication (if any), clarification of stormwater BMP locations within open space, and defined long-term ownership and maintenance responsibilities, the Planning Board cannot ensure that required common open space will be

permanently protected, function as intended, and be properly maintained in accordance with Section XI.Q.10.5.d.

VHB recommends that the Planning Board require the Applicant to:

- Provide a separate Open Space Plan clearly delineating all common open space areas;
- Identify which areas, if any, are proposed for public dedication versus private ownership;
- Clearly distinguish passive open space, active recreational space, landscaped areas, and stormwater BMP areas, including identification of which BMPs are located within designated open space;
- Provide open space calculations demonstrating compliance with Section 10.5.d;
- Identify the proposed Resident's Association or equivalent entity responsible for long-term ownership, maintenance, and operation of common open space and shared infrastructure; and
- Provide a brief narrative explaining the logic of the proposed trail and path layout and how it connects civic, recreational, and natural resource areas within the development.

*MEI Response: The proposed project's open space requirements are established in accordance with the provisions of Zoning Section XI.V: MBTA Communities Multi-Family Overlay District.*

*All open space areas are now clearly delineated on the Overall Key Site Plan (Sheet C4.0), with total areas for both formal and informal open space identified. An Open Space Zoning Matrix has also been added to the Cover Sheet C1.0 to document compliance with Section XI.V.6.3.*

*All open space areas will be privately owned and maintained. The project's management company will be responsible for maintaining the park areas within the North Neighborhood, while a Homeowners Association (HOA) will be responsible for contracting and funding maintenance of the park areas within the South Neighborhood.*

*The trail network is intended to provide a natural, less formal pathway system for enjoyment of the surrounding open space areas. In addition, the trail system is designed to accommodate a future connection to potential development located south of the South Neighborhood. A portion of the trail will also provide an informal connection from the northeast corner of the North Neighborhood to the fieldhouse, pickleball courts, and pool area.*

*The open space areas are provided as follows:*

**North Neighborhood Land Areas:**

- Lot 3 Total Area = 1,621,928 SF
- Lot 3 Developable Land Area = 606,135 SF
- Total Community Open Space = 149,000 SF – 25% (20% minimum required)
- Formal Open Space = 116,000 SF – 77.8% (65% minimum required)
- Informal Open Space = 33,000 SF – 22.2% (35% maximum allowed)

**South Neighborhood Land Area:**

- *Lot 1 Total Area = 905,881 SF*
- *Lot 2 Total Area = 206,411 SF*
- *Lot 1 & 2 Developable Land Area = 569,531 SF*
- *Total Community Open Space = 127,050 SF – 22% (20% minimum required)*
- *Formal Open Space = 86,450 SF – 68.0% (30% minimum required)*
- *Informal Open Space = 40,600 SF – 32.0% (70% maximum allowed)*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that the revised submission now includes open space information on the Overall Key Site Plan and an Open Space Zoning Matrix on the cover sheet, including formal and informal open space calculations for the North and South Neighborhoods. VHB also acknowledges the Applicant's clarification that open space areas are proposed to remain privately owned and maintained by the North Neighborhood management company and the South Neighborhood HOA.

However, this comment should remain partially outstanding. The Applicant should provide sufficient backup to verify the open space calculations shown on the plans, including lot closure calculations or equivalent area verification for the formal and informal open space areas. The Applicant should also confirm that the proposed ownership and maintenance structure is consistent with the applicable RH-MFOD zoning provisions and any incorporated subdivision requirements. If open space areas are required to be publicly owned, publicly accessible, separately conveyed, or otherwise permanently protected, the plans and legal documentation should be revised accordingly.

VHB also notes that stormwater BMPs appear to be located within or adjacent to areas identified as open space. The Applicant should verify whether stormwater basins, constructed wetlands, infiltration basins, or other BMP areas are included in the open space calculations and whether such facilities may be located on open space lots under the applicable zoning and subdivision provisions. According to XI.Q.10.5.d.1, it says "Use. To the greatest extent possible, such open space shall be left in its undisturbed natural condition or, at the discretion of the PAA, it shall be developed so as to be appropriate, in size, shape, dimension, location, and character to assure access to and its use as a park, recreational area, and visual amenity for the development and its residents." If stormwater BMPs are not permitted within designated open space lots, the plans should be revised to distinguish required open space from stormwater management areas and other infrastructure.

The Applicant also indicates that the trail network is intended to function as a natural, informal pathway system. VHB notes that portions of the trail alignments appear to include relatively steep longitudinal grades and cross slopes, but the submission does not identify the design criteria used to establish acceptable trail slopes.

VHB recommends that the Planning Board require the Applicant to verify the open space calculations, confirm the required ownership and protection structure for open space areas, clarify whether stormwater BMPs are included in the open space calculations or located on designated open space lots, and revise the plans and legal documentation as necessary to clearly distinguish open space areas from stormwater management areas and other infrastructure. VHB further recommends that the Applicant identify the design standards used for

the proposed trail system and confirm that the proposed trail grades and cross slopes are consistent with those standards.

*MEI Response: The Applicant has identified open space areas on the Site Plans consistent with the requirements of the RH-MFOD. Conformance with these requirements is tabulated and shown on the Zoning Matrix.*

**VHB Response:** The Applicant's response is noted. Sheet C4.0 provides the supporting delineation and area calculations for the proposed formal and informal open space. The plans also identify vegetated stormwater ponds within the community open space; however, the Applicant has not demonstrated that these stormwater facilities are consistent with the intended use and character of required open space under Section XI.Q.10.5.d.1. The submission also does not identify the design standards or criteria used for the proposed trail grades and cross slopes. This comment remains partially outstanding.

**VHB recommends that the Planning Board determine whether the vegetated stormwater ponds may be included within the required community open space. VHB further recommends that the Applicant identify the design criteria applicable to the proposed trail system. If the Board finds the proposed ownership and maintenance framework acceptable, any approval should require legal documentation establishing the permanent protection, ownership, access, and maintenance responsibilities for the open space areas prior to endorsement, recording, or occupancy, as applicable. XI.Q.10.5.f.4. Stormwater Management, Wetlands and Riverfront Area.**

4. XI.Q.10.5.f.4. Stormwater Management, Wetlands and Riverfront Area.

**(02/25/26) VHB Comment:** VHB understands that the Applicant intends to file, or has filed, the proposed work with the Amesbury Conservation Commission for review under the Massachusetts Wetlands Protection Act and the Amesbury Wetlands Ordinance. As certain elements of the project fall within the Conservation Commission's jurisdiction, detailed review of those components is appropriately within that body's purview.

VHB recommends that the Planning Board coordinate with the Conservation Commission regarding matters subject to its review and consider conditioning any approval on consistency with the final Order of Conditions. VHB will review any revisions resulting from Conservation Commission review, if requested by the Planning Board.

*MEI Response: Applicant is in the approval process with the Conservation Commission. No significant modifications are anticipated at this time in response to Conservation Commission review. The Applicant will update the Planning Board as the process proceeds.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB understands that the Amesbury Conservation Commission review process remains ongoing and that the Commission has not yet completed its review or issued final findings/comments regarding potential impacts to wetlands, riverfront area, and other environmental resource areas. This comment remains applicable.

VHB continues to recommend that the Planning Board coordinate with the Conservation Commission regarding matters within its jurisdiction and request the Commission's findings/comments regarding potential impacts to environmental resources. VHB further recommends that any Planning Board approval be conditioned on consistency with the final Order of Conditions, including any plan revisions, mitigation measures, or conditions required through the Conservation Commission review process.

***MEI Response:** The Applicant and OCED, Planning and Conservation Commission staffs recently met to address concerns and recommendations in a coordinated manner. The current plan reflects those conditions. The Applicant is willing to accept as a condition to RH-MFOD Site Plan Approval, a requirement to obtain a final Wetlands Order of Conditions and will work with the Conservation Commission and Planning Staff to ensure that the requirements of the Wetlands Order of Conditions are consistent with the Planning Board's site plan approval decision.*

**VHB Response:** The Applicant's response is noted. The Applicant has confirmed that the current plans reflect coordination with Planning and Conservation Commission staff and has agreed that final Wetlands Order of Conditions approval may be required as a condition of Site Plan Approval. This comment is considered addressed subject to inclusion of an appropriate condition.

**VHB recommends that any approval require the Applicant to obtain a final Wetlands Order of Conditions and incorporate any resulting plan revisions, mitigation measures, or conditions into the final approved plan set, as applicable.**

5. XI.Q.10.f.5. Stormwater Management, Wetlands and Riverfront Area.

**(02/25/26) VHB Comment:** VHB understands that the Applicant intends to file, or has filed, the proposed work with the Amesbury Conservation Commission for review under the Massachusetts Wetlands Protection Act and the Amesbury Wetlands Ordinance. As certain elements of the project fall within the Conservation Commission's jurisdiction, detailed review of those components is appropriately within that body's purview.

VHB recommends that the Planning Board coordinate with the Conservation Commission regarding matters subject to its review and consider conditioning any approval on consistency with the final Order of Conditions. VHB will review any revisions resulting from Conservation Commission review, if requested by the Planning Board.

***MEI Response:** Applicant is in the approval process with the Conservation Commission. No significant modifications are anticipated at this time in response to Conservation Commission review. The Applicant will update the Planning Board as the process proceeds.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB understands that the Amesbury Conservation Commission review process remains ongoing and that the Commission has not yet completed its review or issued final findings/comments regarding potential impacts to wetlands, riverfront area, and other environmental resource areas. This comment remains applicable.

VHB continues to recommend that the Planning Board coordinate with the Conservation Commission regarding matters within its jurisdiction and request the Commission's findings/comments regarding potential impacts to environmental resources. VHB further recommends that any Planning Board approval be conditioned on consistency with the final Order of Conditions, including any plan revisions, mitigation measures, or conditions required through the Conservation Commission review process.

***MEI Response:** See Applicant's Response Above.*

**VHB Response:** See VHB's Response Above.

XI.Q.10.5.g. Erosion Control.

**(02/25/26) VHB Comment:** The Applicant has submitted an erosion and sedimentation control plan depicting final buildout conditions. However, if the project is to be constructed in phases, the submitted materials do not clearly demonstrate how erosion and sedimentation controls will be implemented and maintained during interim construction phases, as required under Section 10.5.g. In addition, the erosion control requirements outlined in Section 10.5.g are not consistently referenced on the plan sheets to ensure contractor awareness and implementation during construction.

Without phased erosion and sedimentation control details and clear plan references to Section XI.Q.10.5.g requirements, the Planning Board cannot ensure that wetland resource areas and downstream properties will be adequately protected during interim construction conditions.

VHB recommends that the Planning Board require the Applicant to clarify whether the project will be constructed in phases and, if so, to submit a phased erosion and sedimentation control plan demonstrating compliance with Section 10.5.g during each phase. In addition, the Applicant should include erosion and sedimentation control notes consistent with Section 10.5.g on the applicable plan sheets to ensure proper implementation during construction.

***MEI Response:** While the project may ultimately be constructed in several phases, the initial phase will consist of clearing and grubbing of the entire site, followed by filling operations to bring the site to subgrade elevations.*

*Because the entire site will be disturbed at the outset of construction, erosion and sedimentation controls will be installed in accordance with the approved Erosion Control Plans provided with this submission and maintained until disturbed areas are fully stabilized.*

*In addition, a detailed Stormwater Pollution Prevention Plan (SWPPP) will be prepared and implemented prior to the start of construction. Further details regarding construction phasing and staging areas will be developed in coordination with the site contractor, once the site contractor is selected and hired.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges the clarification that the initial construction phase is anticipated to include clearing, grubbing, and filling of the entire site, with erosion and sedimentation controls installed in accordance with the submitted Erosion Control Plans. VHB also acknowledges the Applicant's statement that a SWPPP will be prepared prior to construction.

However, this comment should remain partially outstanding. Given the extent of proposed earth filling, the anticipated full-site disturbance at the outset of construction, and the potential for phased construction and partial occupancy, VHB recommends that a draft SWPPP be provided for review prior to approval rather than deferred until after approval or contractor selection. The current submission does not clearly demonstrate how construction-phase runoff, sediment control, temporary stabilization, construction access, and interim drainage conditions will be managed during mass grading and filling operations.

VHB also notes that the site appears to have limited available area for temporary sediment basins or other temporary stormwater BMPs, particularly where active park areas and permanent subsurface stormwater systems are proposed. The Applicant should demonstrate at a planning level where temporary erosion controls, sediment basins or equivalent BMPs, construction entrances, stockpile areas, diversion measures, and stabilization measures can be accommodated without conflicting with permanent stormwater infrastructure, groundwater constraints, wetlands, or occupied areas.

VHB recommends that the Planning Board require the Applicant to submit a draft SWPPP prior to approval, including construction sequencing, staging, temporary stormwater and sediment controls, construction access and truck tracking controls, stabilization measures, and any phase-specific erosion and sedimentation control measures. Final contractor means and methods may be refined prior to construction, but the Applicant should demonstrate at this stage that the proposed earthwork and phasing approach can be implemented while protecting downstream properties and environmental resources.

MEI Response: *The applicant has provided updated erosion control plans providing additional details and specific limits of work. The following note is included in the plans:*

*"THE INTENT OF THESE EROSION CONTROL NOTES AND PLANS IS TO DELINEATE THE LIMITS OF WORK AND PROVIDE GENERAL GUIDELINES FOR THE INSTALLATION AND MAINTENANCE OF EROSION AND SEDIMENT CONTROL MEASURES. THE CONTRACTOR SHALL PREPARE AND SUBMIT A STORMWATER POLLUTION PREVENTION PLAN (SWPPP) IN ACCORDANCE WITH THE 2022 EPA NPDES CONSTRUCTION GENERAL PERMIT PRIOR TO THE COMMENCEMENT OF ANY LAND-DISTURBING ACTIVITIES. A COPY OF THE APPROVED SWPPP SHALL BE SUBMITTED TO THE CITY PRIOR TO THE START OF CONSTRUCTION, THE OWNER AND CONTRACTOR SHALL ATTEND ONE OR MORE PRE-CONSTRUCTION MEETINGS, AS DIRECTED BY THE CITY, TO REVIEW THE PROPOSED EROSION AND SEDIMENT CONTROL PLAN, CONSTRUCTION PHASING, SOIL IMPORT HAUL ROUTES, AND PROPOSED WORKING HOURS."*

*It is unusual to require the Applicant to submit a SWPPP prior to approval because the SWPPP is typically developed in conjunction with the Applicant's general contractor who is needed to prepare the details of the Construction Management Plan. For these reasons, the Applicant is willing to accept as a condition to RH-MFOD Site Plan Approval, a requirement to submit a draft NPDES Construction Permit NOI and SWPPP to the Planning Department for review and approval prior to the commencement of construction.*

**VHB Response: The Applicant's response is noted. VHB acknowledges that the final SWPPP will typically be completed in coordination with the selected contractor and refined based on final construction means and methods. However, VHB is not requesting a final SWPPP at this stage. The requested draft SWPPP is intended to provide planning-level information demonstrating that temporary drainage, erosion and sediment controls, stabilization measures, construction access, stockpiling, and interim runoff management can be accommodated during the proposed full-site clearing, substantial soil import, mass grading, and phased construction.**

**Given the proximity of wetlands and other resource areas, groundwater constraints, limited areas available for temporary controls, and the potential for conflicts with permanent stormwater facilities and occupied portions of the development, deferring this evaluation until after Site Plan Approval would not provide the Planning Board with sufficient information to determine whether the proposed construction approach is practicable. This comment remains outstanding.**

**VHB recommends that the Applicant provide a draft, planning-level SWPPP prior to Site Plan Approval identifying the anticipated construction sequence, limits of disturbance, temporary drainage and sediment-control measures, construction entrances and truck-tracking controls, staging and stockpile areas, temporary stabilization measures, and the anticipated locations of temporary sediment basins or equivalent BMPs. The draft may be revised and finalized by the selected contractor prior to commencement of construction.**

XI.Q.10.h. Water Quality.

**(02/25/26) VHB Comment:** See Stormwater Management Section Below.

6. XI.Q.10.5. j. Lighting.

**(02/25/26) VHB Comment:** The Applicant's narrative states that site lighting has been designed to meet the maximum height requirements for parking areas, driveways, and pedestrian walkways, and that preferred fixture designs are included in the architectural plans. However, the submitted civil plans do not clearly document fixture heights by location or demonstrate that lighting levels are designed to meet the minimum illumination standards recommended by the IESNA, as required under Section 10.5.j and Section XI.C.8.i.

Without a photometric plan and fixture height documentation, the Planning Board cannot verify that the proposed lighting will meet required illumination standards while preventing glare, light trespass, and noncompliance with Section XI.Q.10.5.j and Section XI.C.8.i.

VHB recommends that the Planning Board require the Applicant to provide a photometric plan and supporting documentation identifying fixture types, cutoff characteristics, and mounting heights by location, along with a photometric analysis demonstrating compliance with Section 10.5.j and Section XI.C.8.i, including conformance with the most current IESNA Lighting Handbook recommendations.

*MEI Response:* See Landscape Plan LP1 provided with the updated submitted plans.

*Submitted plan sets have been updated to include photometric plans and supporting documentation identifying fixture types, cut-off characteristics, and mounting heights by location, along with corresponding compliance for all site lighting. Note that required building-mounted lighting is called out on architectural plans and elevations. Building-mounted fixtures at all building entrances will provide the light levels required in these locations. Photometric data for these fixtures is not depicted on the site plans as controls for these fixtures vary by location and photometric data for this class of fixtures is not consistently available. Generally, however, fixtures at common entries will be on common controls and fixtures at private entries will be resident controlled. The notable exception will be along shared driveways in the South Neighborhood where garage-mounted fixtures will be controlled in common for site lighting and wayfinding in these areas.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that the revised submission includes a photometric plan and supporting lighting documentation identifying site fixture types, cutoff characteristics, mounting heights, and lighting levels. However, this comment remains partially outstanding.

Based on review of the photometric plan, several pedestrian and roadway areas, including portions of the boulevard and sidewalks, appear to show very low illumination levels, including values around 0.1 foot-candles in areas not solely dependent on building-mounted lighting. In addition, some pedestrian areas adjacent to buildings appear to rely on building-mounted fixtures that are not included in the site photometric analysis. As a result, it is difficult to verify that the proposed lighting provides appropriate maintained illumination levels and uniformity for pedestrian routes, roadway edges, building entrances, common areas, and shared driveway areas.

VHB recommends that the Planning Board require the Applicant to supplement the photometric documentation to demonstrate that the combined site and building-mounted lighting design provides

appropriate maintained average, minimum, and maximum illumination levels and uniformity ratios for parking areas, pedestrian routes, roadways, building entrances, and common areas, consistent with applicable IES/IESNA guidance and local zoning requirements. The documentation should also confirm fixture types, mounting heights, cutoff/shielding characteristics, control approach, and light levels at property lines to evaluate visibility, glare, and light trespass.

*MEI Response: Applicant's Response: The photometric plans have been updated to include the building-mounted lighting at building entrances. A typical fixture suited to this use was selected with spec sheets included with those previously provided. Dusk-to-dawn illumination will be standard at all common building entrances. Lighting at private entries like patio doors will be resident controlled. The Project design and building placement ensure that very little light will spill into neighboring properties.*

**VHB Response:** The Applicant's response is noted. The updated photometric plans include building-mounted lighting at building entrances and provide additional fixture and control information. However, several portions of the pedestrian and roadway network continue to show very low (0.1, 0.2 Lumens) or zero calculated illumination levels, and the submission does not identify the specific IES/IESNA design criteria used to evaluate the proposed lighting. This comment remains partially outstanding.

**VHB recommends that the Applicant identify the applicable lighting criteria used for the various site areas and demonstrate that the proposed maintained illumination levels are consistent with those criteria. Alternatively, the Planning Board should determine whether the lighting levels shown on the revised photometric plans are sufficient for the proposed residential development.**

7. XI.Q.10.5.m. Utilities.

**(02/25/26) VHB Comment:** The submitted plans include typical sections indicating underground utility conduits and piping; however, the plan-level utility layout does not clearly identify the location of electric, telecommunications, and gas infrastructure, including associated transformers, switchgear, or utility vaults, as required under Section 10.5.m.1. While underground installation is indicated in section, the horizontal location and extent of these utilities are not shown on the utility plans.

In addition, Section 10.5.m.2 requires the Applicant to demonstrate that the proposed development will not overburden municipal water, sewer, or other public utility systems and that it is consistent with the City's Planned Infrastructure Report and Capital Improvement Plan. Documentation confirming such coordination has not been provided.

Without clearly defined utility layouts and confirmation of municipal capacity, the Planning Board cannot determine whether the project complies with Section XI.Q.10.5.m or ensure that required infrastructure can be safely accommodated without overburdening existing public systems.

VHB recommends that the Planning Board require the Applicant to revise the utility plans to clearly identify the location of all underground electric, telecommunications, and gas utilities, including transformers, vaults, and related appurtenances. In addition, the Applicant should provide written confirmation or correspondence from DPW demonstrating that the project's water, sewer, and utility demands can be accommodated by existing municipal infrastructure and are consistent with the City's Planned Infrastructure Report and Capital Improvement Plan, as required under Section 10.5.m.

***MEI Response:** The conceptual layout has been added to the Site Utility Plans, Sheets 7.0–7.3. The final location will be determined by the utility provider and will not be finalized until a work order is submitted to the utility company.*

*During the planning process for the MBTA zoning, the sewer and water design were evaluated and accounted for in the projected capacity of the existing sewer and water treatment facilities. The applicant has requested that a letter be provided by the Amesbury DPW.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that conceptual underground utility layouts have been added to the revised Site Utility Plans and understands that final electric, telecommunications, and gas utility locations will be coordinated with the respective utility providers.

This comment is considered partially addressed. While additional utility information has been provided, final utility locations and appurtenances remain subject to coordination, and written confirmation from Amesbury DPW regarding water and sewer capacity has not yet been provided. In addition, because portions of the roadway network, including the Main Boulevard, may be proposed for public ownership or future acceptance, the Applicant should clarify which utilities within those areas will be publicly owned, privately owned, or maintained by third-party utility providers.

VHB recommends that the Planning Board require written confirmation from Amesbury DPW that the proposed water, sewer, drainage, and related utility infrastructure, including capacity, layout, ownership, and maintenance responsibilities, are acceptable within areas proposed for public acceptance. The Applicant should also provide updated utility plans or a brief utility ownership narrative distinguishing public, private, and franchise utilities prior to construction.

***MEI Response:** Correspondence from the DPW director is attached confirming water and sewer capacity. The only publicly owned utilities are those within the proposed public portion of the boulevard roadway. If the City does not accept dedication of the boulevard road, all utilities within the road shall be privately maintained. Utilities outside any publicly-dedicated areas will be privately maintained.*

**VHB Response:** The Applicant's response is noted. Correspondence from the Amesbury DPW Director confirms that, based on the demand estimate presented in the ENF, the City's water and sewer systems have adequate capacity to serve the proposed development. The Applicant has also clarified the proposed ownership and maintenance responsibilities for utilities within public and private roadway areas. However, the DPW Director requested a more accurate demand estimate based on the final plan set as the design advances. This comment is considered substantially addressed.

**VHB recommends that the Applicant provide updated water-demand and wastewater-flow estimates based on the final plans for review by the Amesbury DPW prior to issuance of a building permit or commencement of utility construction, as determined appropriate by the City.**

### Section XI.Q.10.3 Materials for Review

Pursuant to Section XI.V.9.3, projects within the MFOD undergoing Site Plan Review incorporate the provisions of Section XI.Q by reference, with terminology adjusted to align with the Governing Laws. Accordingly, the submission requirements set forth in Section XI.Q.10.3 (Materials for Review) apply to this project.

The proposed development is therefore subject to the applicable Site Plan Review submission standards under Section XI.Q.10.3, and the comments below identify areas where additional materials, clarification, or confirmation may be necessary to satisfy those requirements.

1. XI.Q.10.3.g. Lighting.

**(02/25/26) VHB Comment:** The Applicant's narrative states that site lighting has been designed to meet the maximum height requirements for parking areas, driveways, and pedestrian walkways, and that preferred fixture designs are included in the architectural plans. However, the submitted civil plans do not clearly document fixture heights by location or demonstrate that lighting levels are designed to meet the minimum illumination standards recommended by the IESNA.

Without a photometric plan and fixture height documentation, the Planning Board cannot verify that the proposed lighting complies with Section XI.Q.10.3.g or confirm that illumination levels, mounting heights, and fixture characteristics meet applicable safety and performance standards.

VHB recommends that the Planning Board require the Applicant to provide a photometric plan and supporting documentation identifying fixture types, cutoff characteristics, and mounting heights by location, along with a photometric analysis demonstrating compliance with this section, including conformance with the most current IESNA Lighting Handbook recommendations.

*MEI Response:* See Landscape Plan LP1 provided with the updated submitted plans.

*Submitted plan sets have been updated to include photometric plans and supporting documentation identifying fixture types, cut-off characteristics, and mounting heights by location, along with corresponding compliance for all site lighting. Note that required building-mounted lighting is called out on architectural plans and elevations. Building-mounted fixtures at all building entrances will provide the light levels required in these locations. Photometric data for these fixtures is not depicted on the site plans as controls for these fixtures vary by location and photometric data for this class of fixtures is not consistently available. Generally, however, fixtures at common entries will be on common controls and fixtures at private entries will be resident controlled. The notable exception will be along shared driveways in the South Neighborhood where garage-mounted fixtures will be controlled in common for site lighting and wayfinding in these areas.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that the revised submission includes a photometric plan and supporting lighting documentation identifying site fixture types, cutoff characteristics, mounting heights, and lighting levels. However, this comment remains partially outstanding.

Based on review of the photometric plan, several pedestrian and roadway areas, including portions of the boulevard and sidewalks, appear to show very low illumination levels, including values around 0.1 foot-candles in areas not solely dependent on building-mounted lighting. In addition, some pedestrian areas adjacent to buildings appear to rely on building-mounted fixtures that are not included in the site photometric analysis. As a result, it is difficult to verify that the proposed lighting provides appropriate maintained illumination levels and uniformity for pedestrian routes, roadway edges, building entrances, common areas, and shared driveway areas.

VHB recommends that the Planning Board require the Applicant to supplement the photometric documentation to demonstrate that the combined site and building-mounted lighting design provides

appropriate maintained average, minimum, and maximum illumination levels and uniformity ratios for parking areas, pedestrian routes, roadways, building entrances, and common areas, consistent with applicable IES/IESNA guidance and local zoning requirements. The documentation should also confirm fixture types, mounting heights, cutoff/shielding characteristics, control approach, and light levels at property lines to evaluate visibility, glare, and light trespass.

***MEI Response:** Correspondence from the DPW director is attached confirming water and sewer capacity. The only publicly owned utilities are those within the proposed public portion of the boulevard roadway. If the City does not accept dedication of the boulevard road, all utilities within the road shall be privately maintained. Utilities outside any publicly-dedicated areas will be privately maintained.*

**VHB Response:** The Applicant's response appears to have been inadvertently copied from the utilities comment and does not address the lighting issues raised under this section. Because this comment is substantively duplicative of the lighting review under Section XI.Q.10.5.j, VHB refers to its response under that comment. As noted therein, the updated photometric plans include building-mounted entrance lighting, but additional clarification remains necessary regarding the applicable lighting criteria and the very low or zero calculated illumination levels shown in portions of the pedestrian and roadway network. This comment remains partially outstanding.

**VHB recommends that the Applicant address the outstanding lighting items identified in VHB's response under Section XI.Q.10.5.j. Resolution of that comment will also resolve this comment.**

#### Section XI.Q.10.4 Additional Materials for Review

Pursuant to Section XI.V.9.3, projects within the MFOD undergoing Site Plan Review incorporate the provisions of Section XI.Q by reference, with terminology adjusted to align with the Governing Laws. Accordingly, the submission requirements set forth in Section XI.Q.10.4 (Additional Materials for Review) apply to this project.

The proposed development is therefore subject to the applicable Site Plan Review submission standards under Section XI.Q.10.4, and the comments below identify areas where additional materials, clarification, or confirmation may be necessary to satisfy those requirements.

##### 1. XI.Q.10.4.b. Soils.

**(02/25/26) VHB Comment:** Section XI.Q.10.4.b requires submission of a report addressing the potential dangers of erosion and sedimentation associated with the operation and maintenance of the proposed development, and authorizes high-intensity soil mapping, including test borings and analysis, where necessary.

While soil test pits and subsurface data have been provided in support of the stormwater infiltration design, the submitted materials do not clearly indicate whether a comprehensive geotechnical evaluation has been performed addressing broader geotechnical considerations associated with the proposed grading, sloped areas, retaining walls, building foundations, and long-term erosion susceptibility. The stormwater-related subsurface data does not necessarily demonstrate that slope stability, retaining wall design parameters, foundation bearing capacity, and construction-phase erosion risks have been evaluated from a geotechnical standpoint.

Given the scale of proposed grading and the number of retaining walls depicted on the plans, the absence of a geotechnical report introduces uncertainty regarding long-term site stability, structural performance, and erosion control.

Without a geotechnical evaluation addressing these conditions, the Planning Board cannot verify compliance with Section XI.Q.10.4.b or ensure that grading, retaining walls, and foundations are supported by appropriate subsurface analysis.

VHB recommends that the Planning Board should require the Applicant to submit a geotechnical report prepared by a qualified professional addressing subsurface conditions, slope stability, retaining wall design parameters, foundation recommendations, and erosion potential consistent with Section XI.Q.10.4.b prior to approval.

*MEI Response: Applicant engaged a geotechnical engineer, Kevin Martin, P.E., to review test pits and other available information to determine the suitability of the site for the proposed development. Mr. Martin's report is included as a Geotech Memorandum. Per the report, there is no evidence of unusual or unsuitable soil conditions for the proposed development. The report concludes that the subgrade conditions should be favorable for supporting the proposed buildings on a conventional spread footing foundation. There were no areas of expansive fill, soft clay, or other poor to marginal subgrade. As the report further notes, full geotechnical analysis is typically performed in conjunction with preparation of building and retaining wall construction documents, as will be the case with Rocky Hill. No further testing should be required for site plan approval.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that a preliminary geotechnical memorandum has been provided and that it generally indicates favorable subgrade conditions for conventional building foundations.

This comment is considered partially addressed. The memorandum is preliminary and indicates that full geotechnical analysis will be completed during preparation of building and retaining wall construction documents. However, given the extent of proposed grading and imported fill, the geotechnical review should not be limited to buildings and retaining walls. Roadway construction, stormwater BMPs, utility trenches, fill placement, slope stability, groundwater control, and long-term erosion performance also require appropriate geotechnical evaluation, recommendations, testing, and construction-phase oversight.

VHB recommends that the Planning Board require the Applicant to provide a geotechnical review and construction-phase quality control plan prior to the start of construction. The plan should identify how geotechnical recommendations will be developed, reviewed, and implemented for building foundations, retaining walls, roadways, stormwater BMPs, utility areas, slopes, and areas of significant fill. The plan should also identify the required construction observation, compaction testing, subgrade evaluations, groundwater/dewatering controls, and inspection/approval process before and on an ongoing basis during the placement of fill, construction of roadways, installation of stormwater systems, and construction of building foundations. Final geotechnical documentation should be incorporated into the applicable construction documents and updated as field conditions are encountered during construction.

*MEI Response: Applicant will conduct appropriate geotechnical analysis as needed for building and retaining wall design during the course of construction.*

**VHB Response:** The Applicant's response is noted. The proposed future geotechnical analysis is limited to building and retaining wall design and does not address the broader site-related items identified in VHB's prior response, including imported fill placement, roadway subgrades, utility trenches, slopes, groundwater control, compaction testing, and construction-phase observation. Given the extent of proposed grading and imported fill, this comment remains partially outstanding.

**VHB recommends that the Applicant provide a project-wide geotechnical review and construction quality-control plan addressing buildings, retaining walls, roadways, stormwater facilities, utilities, slopes, and areas of significant fill. The applicable recommendations and procedures should be incorporated into the construction documents and approved prior to commencement of the associated earthwork or construction activities. The plan should identify required subgrade evaluations, fill specifications, compaction testing, groundwater and dewatering controls, construction observation, and procedures for documenting and addressing unsuitable or differing field conditions.**

### Section VIII: Off-Street Parking And Loading Regulations

Section VIII applies because the Rocky Hill project proposes new residential dwelling units and accessory community buildings that generate parking demand. As part of Site Plan Review under the RH-MFOD, the development must comply with the minimum parking ratios, dimensional standards, layout requirements, and any applicable loading provisions set forth in Section VIII, unless specifically modified by the overlay district provisions.

#### 1. Section VIII.G.6 Parking and Loading Space Standards.

**(02/25/26) VHB Comment:** The submitted curb schedule identifies a Main Boulevard Curb (Granite Type) and allows alternative curb types including Belgian block, Granite Type VB, or cast-in-place (C.I.P.) concrete. However, the plans do not clearly demonstrate conformance with Section G.6 of Section VIII: off-street parking and loading regulations, which requires vertical granite curbing at all entryway radii and sloped granite curbing along driveways, landscaped islands, and the perimeter of parking areas.

Without clearly identified curb types and confirmation of compliance with Section VIII.G.6, the Planning Board cannot determine whether required granite curbing standards are being met or whether proposed alternatives require discretionary approval.

VHB recommends that the Planning Board require the Applicant to clearly identify all proposed curb types by location on the plans and demonstrate conformance with Section G.6. Where alternatives to the required granite curbing are proposed, including Belgian block, Granite Type VB, or cast-in-place concrete curbing, the Applicant should clearly identify these locations and seek Planning Board approval, as applicable, in accordance with Section G.6.

*MEI Response:* The curb types are identified in the legend on the Site Layout Plans, Sheets 5.0–5.3. The required 6-inch by 18-inch granite curb is provided along the roadway proposed for acceptance by the City as a public road. The plans also allow for alternate curb types in the privately owned roadways, providing flexibility for construction bidding and cost considerations.

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that curb types are identified in the Site Layout Plan legend and that vertical granite curb is proposed along the roadway intended for public acceptance.

This comment is considered partially addressed. Section VIII.G.6 requires vertical granite curbing along all entryway radii and sloped granite curbing along driveways, landscaped islands, and the perimeter of parking areas, unless waived or reduced by the Planning Board where the site stormwater management design uses Low Impact Development strategies in lieu of a conventional storm drainage system. The Applicant's response indicates that alternate curb types may be used along privately owned roadways for construction flexibility, including Belgian block, Granite Type VB, or cast-in-place concrete curbing. However, the revised plans do not appear to propose sloped granite curbing along the driveways, landscaped islands, or perimeter of parking areas as required by Section VIII.G.6.

VHB recommends that the Applicant clearly identify the specific locations where alternate curb types are proposed in lieu of the required sloped granite curbing. To the extent the Applicant proposes curb types that do not meet Section VIII.G.6, VHB recommends that the Applicant formally request a waiver from this requirement and provide supporting justification for Planning Board consideration. The Planning Board should determine whether the requested waiver is appropriate, including whether the proposed stormwater/LID design supports a waiver or reduction of the curbing requirements under Section VIII.G.6.

*MEI Response: The plans provide for the required 6" Type VA4 curbing in the potential public boulevard portion of the project. In the privately owned portions of the project Type VB 5" curb and sloped granite edging is proposed. These proposed materials exceed the requirements of this zoning Section.*

**VHB Response:** The Applicant's response is noted. The proposed curb types have been clarified and are identified as meeting or exceeding the applicable requirements of Section VIII.G.6. This comment is considered addressed.

2. Section VIII.G.13 Parking and Loading Space Standards.

**(02/25/26) VHB Comment:** The plans do not explicitly label parking space or aisle dimensions required to verify compliance with Section G.13 of the Amesbury Zoning Ordinance. Based on scaling, the proposed 90-degree parking spaces appear to be approximately 9 feet by 18 feet, consistent with Section G.13. However, parallel parking areas shown consistent with Figure C appear to scale closer to 8 feet by 22 feet, rather than the illustrated 9 feet by 20 feet configuration.

Without labeled parking space and aisle dimensions, the Planning Board cannot verify compliance with Section VIII.G.13 or determine whether any alternative parking configurations require specific review and approval.

VHB recommends that the Planning Board require the Applicant to label all parking space and aisle dimensions on the plans and to clearly identify any alternative parking configurations proposed pursuant to Section G.13, for Planning Board review and approval, where applicable.

*MEI Response: Parking aisle and stall dimensions are noted as typical on the plans. The parallel parking spaces are designed to be 23 feet long by 8 feet wide, as coordinated during the Technical and Design Review Process. Amesbury regulations specify dimensions of 20 feet long by 9 feet wide; however, the proposed dimensions are more typical and appropriate for parallel parking.*

*The 90-degree parking stalls are designed to be 9 feet wide by 18 feet long, in accordance with the City's design standards.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that the 90-degree parking stalls are designed to meet the 9-foot by 18-foot standard and that the Applicant has clarified the proposed parallel parking spaces are 8 feet by 23 feet.

This comment is considered partially addressed. The proposed parallel parking spaces differ from the 9-foot by 20-foot configuration shown in Section VIII.G.13. To the extent the Applicant proposes an alternate parking dimension, this should be identified as a waiver request with supporting justification for Planning Board consideration.

VHB also notes that some parallel parking spaces appear to be located within roadway areas that may be proposed for public acceptance. The Applicant should clarify which parallel parking spaces are located within proposed public roadway limits versus private roadway areas, as this may affect DPW review, public acceptance, ownership, and maintenance considerations.

VHB recommends that the Applicant revise the plans to label all parking stall and aisle dimensions, identify the public/private roadway status of parallel parking areas, and formally request a waiver for any parking dimensions that do not comply with Section VIII.G.13. The Planning Board should determine whether the requested waiver is appropriate, including for any spaces located within areas proposed for public acceptance.

***MEI Response:** All roadways, drive aisles and stall dimensions are called out on the Site layout plans. Note, the dimensions are called as "typical" on each sheet as dimensioning all stalls would clutter the drawing with notes. The 9' x 18' space requirement is not appropriate for on-street parallel parking. The parallel spaces are proposed as 8' x 23' which is on the larger end for on street parking.*

**VHB Response:** The Applicant's response is noted. The plans identify the proposed parking and aisle dimensions, and the Applicant has clarified that the 8-foot by 23-foot parallel parking spaces are intended to provide a more appropriate configuration for on-street parallel parking than the 9-foot by 20-foot configuration illustrated in Section VIII.G.13. VHB considers the technical clarification addressed.

**VHB recommends that the Planning Board determine whether the proposed alternative parallel parking dimensions are acceptable.**

3. Section VIII.G.16 Parking and Loading Space Standards.

**(02/25/26) VHB Comment:** Section G.16 requires interior parking lot landscaping, including one shade tree per eight spaces, landscaped islands, and a minimum of five percent of the parking area maintained as interior landscaped area. The Applicant has submitted a landscape plan that appears to meet the intent of these standards; however, the required calculation demonstrating compliance with the five percent interior landscaping requirement has not been provided.

Without a documented interior landscaping calculation, the Planning Board cannot verify compliance with the minimum five percent landscaped area requirement of Section VIII.G.16 or make a defensible finding that the parking layout satisfies the Ordinance standards.

VHB recommends that the Planning Board require the Applicant to submit the interior landscape percentage calculation to document and confirm compliance with Section G.16.

***MEI Response:** The Applicant appreciates the Reviewer's observation that the plans appear to meet the intent of these standards. As has been noted elsewhere, the Rocky Hill Design Guidelines developed for the project quite consciously focused on the location, distribution, and character of parking areas. In the North Neighborhood, where surface parking is concentrated, parking runs are broken up by landscape islands, driveways, sidewalks and crosswalks, and free-standing garages. Landscape areas surround all parking areas. Tree counts within and surrounding parking exceed the required ratio, as do the associated landscape areas taken with respect to the Design Guidelines' expectation that the parking be arranged as shown, demonstrating compliance with Section G.16.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges the Applicant's statement that the proposed tree counts and landscaped areas within and surrounding the parking areas exceed the requirements of Section VIII.G.16, and that the parking and landscape layout was developed in accordance with the Rocky Hill Design Guidelines.

VHB does not object to the Applicant's response; however, the supporting five percent interior parking lot landscaping calculation has not been provided.

**VHB recommends that the Planning Board determine whether the Applicant's narrative response is sufficient, or whether the supporting calculation should be provided for confirmation of compliance with Section VIII.G.16.**

4. Section VIII.G.18 Parking and Loading Space Standards.

**(02/25/26) VHB Comment:** The submitted plans do not clearly demonstrate how ADA-compliant accessible and van-accessible parking spaces are provided and allocated across the site. The project includes multiple parking facilities, including on-street visitor parking areas (Driveway Lane, Secondary Road, Main Boulevard), parking barns/garages, and parking serving common-use/amenity buildings. However, the materials do not provide a clear breakdown of required versus proposed accessible parking spaces for each parking facility or identify how these spaces serve the applicable buildings and uses.

Without a clear accounting and allocation of accessible and van-accessible parking spaces by facility and use, the Planning Board cannot verify compliance with Section VIII.G.18 and applicable ADA/521 CMR requirements or ensure that accessible parking is properly distributed to serve each building and amenity.

VHB recommends that the Planning Board request the Applicant clarify the following:

- A summary identifying the required and proposed number of accessible and van-accessible parking spaces for each parking facility, including on-street visitor parking areas and parking barns/garages;
- Identification of accessible parking serving each common-use/amenities, including confirmation that required van-accessible spaces are provided

This information is required to confirm compliance with applicable accessibility requirements.

***MEI Response:** Accessible (handicap) spaces have been distributed throughout the North Neighborhood. Due to the building layout, additional accessible spaces are provided, with a total of 37 spaces proposed where only 9 are required. Five van-accessible spaces are provided, where only 2 are required. The locations are shown on the Site Layout Plans, Sheets 5.0–5.3, along with a summary table on the Cover Sheet, C1.0.*

*One accessible space is provided at the community building in the South Neighborhood. The single-family and townhouse units in the South Neighborhood are not required to be ADA-accessible.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that the revised submission provides accessible parking counts by neighborhood, including accessible and van-accessible spaces in the North Neighborhood and one accessible space at the South Neighborhood community building.

This comment remains partially addressed. While the neighborhood-level counts appear to demonstrate that the overall number of accessible spaces exceeds the minimum requirement, the response does not provide the requested breakdown by parking facility or use. The project includes multiple parking facilities, including on-street visitor parking areas (Driveway Lane, Secondary Road, Main Boulevard), parking barns/garages, and parking serving common-use/amenity buildings. Given the multiple distinct parking areas, visitor parking locations, and common-use amenities throughout the site, a more detailed breakdown is needed to confirm that accessible and van-accessible parking is appropriately distributed and located to serve the applicable buildings, visitor areas, and amenity uses.

VHB recommends that the Applicant provide a required-versus-proposed accessible parking summary by parking facility or use, including common-use/amenity areas, for confirmation of compliance with Section VIII.G.18 and applicable ADA/521 CMR requirements.

*MEI Response:* The required-versus-proposed table is provided on the Site Layout plans for the North Neighborhood. There is only a single required accessible parking space at the community building in the South Neighborhood.

**VHB Response:** The Applicant's response is noted. The Site Layout Plans provide overall accessible parking totals by neighborhood; however, the requested calculations by parking facility have not been provided. The Applicant appears to be treating each neighborhood as a single parking facility. Pursuant to 2010 ADA Standards §208.2, accessible parking must be calculated separately for each parking facility where more than one parking facility is provided on a site.

For clarity, VHB is requesting a separate required-versus-proposed accessible parking calculation for each of the following, as applicable:

North Neighborhood: parking barns/garages; on-street or curbside visitor parking; clubhouse parking; fieldhouse/pool and recreational amenity parking; trail-access parking; and any other separate common-use parking area.

South Neighborhood: residential garage parking; on-street or curbside visitor parking; clubhouse parking; trail-access parking; and any other separate common-use or amenity parking area.

Parking areas may be grouped only where they are physically and operationally integrated and function as a single parking facility. This comment remains partially outstanding.

**VHB recommends that the Applicant provide a parking schedule for both neighborhoods identifying, for each parking facility or justified facility grouping, the total number of spaces, the number of accessible spaces required and provided, the number of van-accessible spaces required and provided, and the building or use served.**

5. Section VIII.G.18 Parking and Loading Space Standards.

**(02/25/26) VHB Comment:** The submitted plans do not identify any EV-ready or EV-capable parking spaces. Pursuant to the Massachusetts Residential Stretch Energy Code, a minimum percentage of parking spaces serving new residential development is required to be EV-ready. In addition, where EV-ready parking is required, applicable accessibility standards under 521 CMR and the 2010 ADA Standards for Accessible Design require that a portion of accessible parking spaces be capable of accommodating EV charging.

Without identification of EV-ready parking and associated accessible EV provisions, the Planning Board cannot verify compliance with the Massachusetts Residential Stretch Energy Code or applicable 521 CMR and ADA requirements governing accessible electric vehicle charging accommodations.

VHB recommends that the Planning Board require the Applicant to clarify whether EV-ready parking is proposed or required under the Residential Stretch Energy Code. If EV-ready parking is required, the plans should be revised to identify the required and proposed number of EV-ready spaces and to demonstrate compliance with 521 CMR and ADA accessibility requirements, including the designation and location of accessible and van-accessible EV-ready spaces.

*MEI Response:* All garages in the South Neighborhood will be EV-ready, satisfying this requirement.

*Twenty (20) percent of the North Neighborhood parking spaces will be EV-ready, as required. The locations are now highlighted on the Site Layout Plans, Sheets C5.2 and C5.3.*

**(05/13/26) VHB Response:** The Applicant's response is noted. The revised plans now indicate that all garages in the South Neighborhood will be EV-ready and that twenty (20) percent of the North Neighborhood parking spaces will be EV-ready, with locations identified on Sheets C5.2 and C5.3.

However, the submission does not clearly demonstrate how the proposed EV-ready spaces correspond to the requirements of the Massachusetts Residential Stretch Energy Code, including a summary of required versus proposed EV-ready and/or EV-capable spaces by parking facility or use. In addition, the plans do not identify whether any accessible parking spaces are designed to accommodate EV charging, nor do they demonstrate compliance with applicable 521 CMR and ADA requirements for accessible EV charging infrastructure.

VHB also notes that the revised plans do not clearly demonstrate the physical feasibility of the proposed EV-ready locations. Several EV-ready spaces appear to be located adjacent to sidewalks, landscaped areas, and/or areas identified for snow storage. The plans do not show the anticipated location of EV charging equipment, bollards/protection, conduit routing, clear pedestrian access, or accessible route clearances. Without this information, it is unclear whether future EV charging equipment can be installed without encroaching into sidewalks, ADA clear widths, accessible parking access aisles, landscape areas, or designated snow storage areas.

Without a clear accounting of EV-ready parking requirements and confirmation of accessible EV accommodations and physical feasibility, the Planning Board cannot verify compliance with the Residential Stretch Energy Code or applicable accessibility standards.

VHB recommends that the Planning Board require the Applicant to provide a summary of required and proposed EV-ready and/or EV-capable spaces, demonstrate compliance with 521 CMR and ADA requirements, and identify the anticipated location and layout of EV charging equipment at representative EV-ready spaces. The Applicant should also demonstrate that EV infrastructure can be installed without conflicting with

sidewalks, accessible routes, access aisles, landscaping, snow storage areas, or required parking and maneuvering clearances for both interior garage spaces and exterior surface parking spaces.

*MEI Response: The exterior EV required spaces are shown on the Site Layout Plans. Any required infrastructure would consist of 4-inch buried conduits w/ conductors and small charging bollard typically situated off the end and between the EV spaces. This infrastructure can easily be installed without conflicting with sidewalks, accessible routes, access aisles, landscaping, snow storage areas, or required parking and maneuvering clearances. In locations where the EV charging bollards will be in sidewalk areas, they will be located along the curb side of the sidewalk and maintain 48" clearance for pedestrians from back of bollard to the back of sidewalk.*

**VHB Response:** The Applicant's response is noted. The Cover Sheet and Site Layout Plans identify the required and proposed EV-ready parking counts and indicate the exterior spaces intended to receive EV charging equipment. The response also describes the anticipated use of charging bollards and states that a 48-inch pedestrian clearance will be maintained. However, the charging equipment itself is not shown on the plans, and several designated charger locations appear to have potential conflicts with sidewalks or accessible routes, access aisles, landscaping, and snow-storage areas. As a result, the physical feasibility of the proposed charger locations has not been fully demonstrated. This comment remains partially outstanding.

**VHB recommends that the Applicant add representative charging-equipment layouts and plan callouts showing the proposed bollard or charger locations and required clearances at the identified exterior charging spaces, particularly where the equipment may be located within or adjacent to sidewalks, accessible parking areas, or snow-storage areas. The layouts should demonstrate that the equipment can be installed without obstructing accessible routes, access aisles, pedestrian clearances, landscaping, snow-storage operations, or required parking and maneuvering areas.**

## Stormwater Management Compliance

VHB has reviewed the proposed stormwater management system and its interaction with jurisdictional wetland resource areas for conformance with applicable state and local regulations. This review encompassed the Stormwater Manager Report prepared by Millennium Engineering, Inc., dated August 11, 2025, revised July 7, 2026, the Proposed Site Plan Review Plans dated August 11, 2025, revised June 29, 2026, the Development Narrative, and relevant sections of the Amesbury Zoning Ordinance, including stormwater and related provisions within the Multi-Family Overlay District.

Due to the extent and scale of the comments outlined below, the Stormwater and General Comments sections are limited to high-level technical and regulatory observations. Detailed, sheet-by-sheet and micro-level review has not been completed at this time, as substantive plan revisions and potential layout modifications are anticipated in response to these comments.

VHB will provide additional detailed comments upon submission of revised plans reflecting any material changes.

VHB understands that the Applicant intends to file, or has filed, the proposed work with the Amesbury Conservation Commission for review under the Massachusetts Wetlands Protection Act and the Amesbury Wetlands Ordinance. As certain elements of the project fall within the Conservation Commission's jurisdiction, detailed review of those components is appropriately within that body's purview.

VHB recommends that the Planning Board coordinate with the Conservation Commission regarding matters subject to its review and consider conditioning any approval on consistency with the final Order of Conditions. VHB will review any revisions resulting from Conservation Commission review, if requested by the Planning Board.

**Per Section XI.Q.10.5.a.5(f) & (g) Subdivision Rules and Regulations**

1. *7.10.B. Design Basis.*

**(02/25/26) VHB Comment:** Section 7.10.B establishes design criteria for storm sewers, culverts, detention and retention systems, including conveyance of the 25-year storm for storm sewers, conveyance of the 100-year storm for culverts, and no increase in peak discharge to off-site areas for the 25- and 100-year storm events. However, the submitted materials do not include hydraulic capacity calculations for storm sewer pipes or culverts demonstrating compliance with the required design storms. In addition, the submission does not provide peak runoff rate summaries for the 25-year storm event for the proposed stormwater basins, nor does it include design calculations or details for stormwater outfalls and end structures, such as riprap aprons, level spreaders, or other energy dissipation and erosion protection measures at discharge locations.

Without storm sewer and culvert hydraulic capacity calculations, peak discharge summaries, and outfall design details, the Planning Board cannot verify that the stormwater system complies with the design storm requirements of Section 7.10.B or confirm that downstream properties and resource areas are adequately protected from increased runoff and erosion.

VHB recommends that the Planning Board require the Applicant to submit complete stormwater conveyance and design documentation demonstrating compliance with Section 7.10.B, including storm sewer and culvert hydraulic capacity calculations, peak runoff rate summaries for the 25-year storm event, and outfall and end-structure design details and calculations for all stormwater discharge locations.

*MEI Response:* Please note that the HydroCAD model confirms that the 25-year storm event is fully conveyed through the drainage network to the outfall. Pipe diameters, lengths, and slopes are all incorporated within the model.

*Please refer to the relevant nodes within the hydrograph output. The model reports the 25-year peak flow rate through each pipe, as well as the maximum hydraulic grade line (HGL) elevation within associated catch basins or structures, confirming that the 25-year storm event is conveyed without flooding.*

*An example of this reporting is provided below for the pipe segment between DMH 30 and DMH 29. At this location, the peak water surface elevation exceeds the pipe crown but remains well below the rim elevation, indicating that the system operates under surcharge conditions without overtopping.*

*All information required under Section 7.10.B is included within the HydroCAD model.*

**(05/13/26) VHB Response:** VHB acknowledges MEI's response that the HydroCAD model reportedly includes 25-year storm routing through the drainage network. However, the revised submission provided for review does not appear to include the HydroCAD output necessary to verify this statement.

In addition, the peak runoff rate summary tables included in the Hydrologic Analysis section present results for the 2-year, 10-year, and 100-year storm events only, despite the report stating that the stormwater management system was analyzed for the 2-year, 10-year, 25-year, and 100-year storm events.

As a result, VHB cannot independently confirm compliance with Section 7.10.B with respect to the 25-year storm sewer design criteria or the required 25-year peak discharge comparison for detention/retention systems. VHB also notes that the submission does not appear to include details or supporting calculations for stormwater outfalls and end structures, including riprap aprons, level spreaders, or other energy dissipation and erosion protection measures at discharge locations. In addition, hydraulic calculations have not been provided for the proposed 12-inch culvert near the emergency access.

To fully address this comment, VHB recommends that the Planning Board require the Applicant to provide the complete HydroCAD output or equivalent supporting calculations documenting the 25-year storm event analysis, including pipe hydraulic capacity/HGL information and peak runoff rate summaries for the 25-year storm.

VHB further recommends that the Planning Board require the Applicant to provide design details and supporting calculations for all stormwater outfalls and end structures, and submit hydraulic calculations for the proposed 12-inch culvert near the emergency access.

***MEI Response:** The pipe flow 25-year storm event analysis, including pipe hydraulic capacity/HGL information and peak runoff rate summaries for the 25-year storm is now provided attached to the stormwater calculations. The calculation has been added to the 25-year pipe flow for the 12" emergency road culvert.*

**VHB Response:** The Applicant's response is noted. The revised Stormwater Report includes the requested 25-year pipe-flow analysis and hydraulic calculations for the proposed emergency-access culvert. Based on the information provided, this comment is considered addressed.

## 2. 7.10.B.1 Design Basis.

**(02/25/26) VHB Comment:** Subdivision Regulations §7.10(B)(1) requires that Low Impact Development (LID) site planning and design strategies be incorporated into a project unless demonstrated to be infeasible. The regulation establishes an affirmative obligation to evaluate and utilize LID practices to the maximum extent practicable.

The submitted stormwater design relies primarily on conventional stormwater management practices, including centralized subsurface infiltration systems and surface basins. The submission does not include a written evaluation of LID feasibility or an alternatives analysis demonstrating that distributed LID practices were incorporated to the maximum extent practicable or determined to be infeasible.

Specifically, the materials do not document whether opportunities for decentralized practices, such as rain gardens, bioretention areas, permeable pavement, porous pavers, vegetated filter strips receiving sheet flow, or impervious area reduction, were evaluated during site design. Without this analysis, compliance with §7.10(B)(1) cannot be verified.

VHB recommends that the Planning Board should require the Applicant to submit a written Low Impact Development (LID) feasibility analysis demonstrating how LID strategies were incorporated to the maximum extent practicable or, where not utilized, providing a clear engineering justification for infeasibility consistent with §7.10(B)(1) prior to approval.

***MEI Response:** While the "new urbanist" design developed by the Applicant in coordination with the Design Review Committee does not lend itself to all LID strategies, the project design has incorporated many such*

*measures. Among the LID measures are the following: permeable pavement surfaces for the emergency access, stone drip edge along the North Neighborhood building foundations, deep-sump hooded catch basins, water quality units to remove total suspended solids (TSS), subsurface infiltration basins, constructed stormwater wetlands providing wet meadow habitat, and surface stormwater infiltration and detention basins with pollinator meadow plantings.*

*The stormwater management system has been designed to convey and provide post-development peak attenuation for stormwater runoff up to the 100-year storm event (8.94 inches). In addition, removal of total suspended solids (TSS) is proposed for all developed areas of the site:*

- *95 deep sump catch basins – 25% TSS removal*
- *13 Water Quality Treatment Units – 25% TSS removal*
- *8 subsurface infiltration basins – 80% TSS removal*
- *5 open infiltration ponds – 80% TSS removal*
- *4 constructed stormwater wetlands – 80% TSS removal*

**(05/13/26) VHB Response:** VHB acknowledges the Applicant's statement that the project's "new urbanist" layout was developed in coordination with the Design Review Committee and may not lend itself to all LID strategies. However, that statement alone does not constitute a LID feasibility and alternatives analysis under §7.10.B.1.

VHB further notes that several of the measures identified by the Applicant, such as deep-sump catch basins, water quality units, and larger centralized infiltration or detention systems, are more appropriately characterized as conventional or centralized stormwater management practices rather than decentralized Low Impact Development measures. While elements such as permeable pavement and certain distributed infiltration features may be consistent with LID principles, the response as submitted does not clearly demonstrate that decentralized, source-control LID practices were evaluated and incorporated to the maximum extent practicable. MassDEP's LID framework emphasizes distributed micro-scale controls located near source areas, rather than primary reliance on centralized "pipe-and-basin" systems.

The Planning Board should determine whether the information provided is sufficient for its purposes under §7.10.B.1. If additional support is desired, VHB recommends that the Applicant provide a concise formalized written LID feasibility and alternatives analysis identifying which decentralized LID practices were considered during site planning and the basis for any measures not incorporated.

*MEI Response:* *The project team evaluated the feasibility of implementing Low Impact Development (LID) stormwater management techniques in accordance with the applicable stormwater management standards. Due to the Rocky Hill site-specific design guidelines, which require curbed roadways and building facades to be located close to the back of the sidewalks, there is insufficient space to incorporate LID practices such as grassed swales and rain gardens between the roadways and buildings.*

*Given these design constraints, the Applicant contends that the requirements of Section 7.10.B.1 have been satisfied, as LID techniques such as open swales and rain gardens are not feasible for this development. However, the proposed design does incorporate decentralized stormwater treatment areas, which is one of the core principles of LID design.*

*The proposed stormwater management system maximizes groundwater recharge and water quality treatment to the maximum extent practicable. In addition, the project, as designed, complies with Section 7.10.B.3.a.ii by providing infiltration and management of a runoff volume equivalent to, or greater than, one inch of runoff multiplied by the total post-construction impervious surface area of the new development site.*

**VHB Response:** The Applicant's response is noted. The Applicant has provided additional explanation regarding the LID practices evaluated, the site-design constraints limiting certain distributed measures, and the decentralized treatment and infiltration practices incorporated into the proposed design. Based on the information provided, this comment is considered addressed.

3. 7.10.B.3 Design Basis.

**(02/25/26) VHB Comment:** Section 7.10.B.3 requires stormwater management systems to achieve 90% average annual Total Suspended Solids (TSS) removal and 60% average annual Total Phosphorus (TP) removal based on total post-construction impervious area, calculated on an average annual basis. Based on review of the submitted stormwater calculations, several stormwater management basins appear to provide approximately 85% TSS removal at the primary BMP level. While pretreatment practices and associated TSS removal efficiencies are identified, the submission does not clearly demonstrate cumulative TSS removal for complete treatment trains, including pretreatment and downstream BMPs.

In addition, the submission does not include a site-wide TP removal calculation demonstrating achievement of the required 60% average annual TP removal, accounting for the distribution of impervious area among the various stormwater treatment systems.

Without clear cumulative TSS removal calculations and a site-wide Total Phosphorus removal analysis, the Planning Board cannot verify compliance with the pollutant removal performance standards of Section 7.10.B.3 or confirm that the stormwater system meets required water quality treatment objectives.

VHB recommends that the Planning Board require the Applicant to revise the stormwater calculations to clearly demonstrate cumulative average annual TSS removal for each treatment train and to provide a site-wide average annual Total Phosphorus (TP) removal calculation, weighted by post-construction impervious area, demonstrating compliance with the requirements of Section 7.10.B.3.

***MEI Response:** TSS removal calculations were provided for each of the BMPs. Pretreatment TSS removal sheets were provided for each of the infiltration BMPs requiring the 44% TSS removal. The 44% pretreatment requirement is met by passing stormwater through deep sump catch basins and water quality units prior to discharging into the infiltration basins. With regards to total phosphorus, all of the basins within the south neighborhood hold at a minimum the 2-year storm event, which based on the EPA tables provides 100% phosphorus removal. The infiltration basins in the north neighborhood hold at least the water quality volume, which results in about 85% total phosphorus removal. The constructed wetlands remove approximately 50–60%. This demonstrates compliance with Section 7.10.B.3, as requested.*

**(05/13/26) VHB Response:** VHB acknowledges the Applicant's response and agrees that portions of the revised submission appear to address some pollutant removal requirements. However, based on review of the revised plans and calculations, the treatment train documentation remains incomplete and, in several cases, does not appear to match the structures shown on the plans.

For several infiltration BMPs, TSS calculations have been provided, but the plans do not appear to show consistent pretreatment devices for all tributary flow paths. Some specifically are:

- Infiltration Basin 1: DMH 4 appears it should be a CDS structure.
- Infiltration Basin 2: CB 42, CB 43, and the tributary system upstream of DMH 29 appear to require additional pretreatment.
- Infiltration Basin 3: CB 44 and DMH 24 appear to require conversion to water quality structures.
- Infiltration Basin 4: DMH 16 appears it should be converted to a water quality structure.
- Subsurface Infiltration 1B: DMH 8A appears it should be converted to a CDS or equivalent water quality structure.
- Subsurface Infiltration 3: An unlabeled DMH upstream of the inlet appears it should be identified and designed as a CDS structure.
- Subsurface Infiltration 6: AD 1 appears it should be converted to a CDS or equivalent water quality structure.

In addition, pollutant removal calculations for the constructed wetlands and detention systems have not been provided, and DMH 27 appears to be missing from the drain manhole schedule. While the Applicant's narrative suggests that the required Total Phosphorus removal may be achieved, a clear site-wide weighted average annual TP removal calculation has not been provided.

As submitted, VHB cannot fully verify compliance with Section 7.10.B.3. Where upstream runoff does not pass through the pretreatment devices assumed in the calculations, the 44% pretreatment demonstration is not valid. More broadly, without complete treatment train calculations for all BMPs, the Planning Board cannot confirm that the proposed system achieves the required 90% average annual TSS removal and 60% average annual TP removal.

VHB recommends that the Planning Board require the Applicant to revise the plans and calculations so that the treatment trains shown on the plans match the treatment trains assumed in the pollutant removal calculations. For all BMPs, the Applicant should provide a complete treatment train calculation that first demonstrates compliance with the 44% pretreatment requirement where applicable, and then demonstrates compliance with the full 90% average annual TSS removal requirement for the overall treatment train. This should include all infiltration systems, constructed wetlands, and detention systems.

VHB further recommends that the Planning Board require the Applicant to provide a site-wide Total Phosphorus removal calculation weighted by tributary impervious area to each BMP.

Also to revise the drainage documentation to address missing structure information, including DMH 27.

***MEI Response:** Additional detail has been added documenting the pretreatment and total TSS removal requirements. Note that the project now provides 1" water quality volume satisfying the Amesbury Drainage requirements for phosphorus removal per Section 7.10.B.3.a.ii.*

**VHB Response:** The Applicant's response is noted. The revised treatment-train calculations for the North Neighborhood apply a 25% TSS-removal credit for deep-sump hooded catch basins followed by an 80%

credit for the subsurface infiltration systems, resulting in a cumulative TSS-removal efficiency of 85%. Regardless of whether the proposed catch basins satisfy the applicable MassDEP pretreatment requirements, the documented treatment train does not demonstrate compliance with the 90% average annual TSS-removal requirement of Section 7.10.B.3. In addition, a complete site-wide calculation demonstrating compliance with the applicable TSS and TP removal standards has not been provided. This comment remains outstanding.

**VHB recommends that the Applicant revise the North Neighborhood treatment trains to achieve and document at least 90% average annual TSS removal through enhanced pretreatment, an additional treatment practice, or another technically supported design revision. VHB further recommends that the Applicant complete EPA Region 1's BMP Accounting and Tracking Tool for the full project using the proposed land uses, tributary areas, impervious cover, and BMP characteristics to document site-wide TSS and TP load reductions and support applicable City MS4 and TMDL accounting.**

4. Amesbury Zoning Ordinance XI.Q.10.5.h. Water Quality.

**(02/25/26) VHB Comment:** Section XI.Q.10.5.h requires that stormwater management systems be designed to protect groundwater quality and maximize groundwater recharge through the use of appropriate site planning and design techniques, including Low Impact Development (LID) practices where feasible.

The submitted stormwater design relies primarily on centralized infiltration basins and subsurface infiltration systems. The submission does not include documentation demonstrating that decentralized LID practices were evaluated and incorporated to maximize groundwater recharge and protect water quality consistent with this section.

Specifically, the materials do not document whether distributed water quality practices, such as bioretention areas, rain gardens, vegetated swales, impervious area reduction, or other source-control measures, were evaluated as part of the site design process. Without this analysis, the Planning Board cannot verify that groundwater recharge and water quality protection have been maximized as required under Section XI.Q.10.5.h.

VHB recommends that the Planning Board should require the Applicant to submit documentation demonstrating how the stormwater design maximizes groundwater recharge and protects water quality consistent with Section XI.Q.10.5.h, including a written evaluation of Low Impact Development (LID) strategies incorporated into the project or a clear engineering justification where such practices are determined to be infeasible. This submission may cross-reference the required analysis under Subdivision Regulations §7.10(B)(1), as applicable.

***MEI Response:** The stormwater systems have been designed to meet or exceed the requirements of the Stormwater Management Handbook. The total recharge proposed on site is 3.3 times the required recharge volume, and the proposed water quality volume meets or exceeds Handbook requirements. Detailed calculations are provided within the stormwater report.*

*Given the site layout encouraged by the Design Guidelines of the MBTA zoning and the Design Review Committee, together with wetland location, soils, and bedrock, it is not feasible to implement all potential LID techniques for the project. Numerous LID measures have been incorporated per Response #34.*

**(05/13/26) VHB Response:** VHB acknowledges the Applicant's response that the proposed system meets or exceeds Stormwater Handbook recharge and water quality volume requirements, and that site constraints such as layout, wetlands, soils, and bedrock limit the feasibility of some LID techniques. However, compliance with recharge volume requirements alone does not, by itself, demonstrate that groundwater recharge and water quality protection have been maximized consistent with Section XI.Q.10.5.h.

As with the response to §7.10.B.1, the submission does not provide a clear written evaluation of which decentralized LID and source-control practices were considered during site design, where they were evaluated, and why additional measures were determined to be infeasible. While the Applicant references prior LID measures, many of those features are conventional or centralized stormwater practices and do not, by themselves, demonstrate that groundwater recharge and water quality protection have been maximized through site planning and distributed design techniques.

The Planning Board may determine whether the information provided is sufficient for its purposes under Section XI.Q.10.5.h. If additional support is desired, VHB recommends that the Planning Board require the Applicant to provide a concise written evaluation describing how the proposed design maximizes groundwater recharge and protects water quality, including which decentralized LID practices were considered and the engineering basis for measures not incorporated. This may cross-reference any LID feasibility analysis submitted in response to Subdivision Regulations §7.10.B.1.

*MEI Response: The project team evaluated the feasibility of implementing Low Impact Development (LID) stormwater management techniques in accordance with the applicable stormwater management standards. Due to the Rocky Hill site-specific design guidelines, which require curbed roadways and building facades to be located close to the back of the sidewalks, there is insufficient space to incorporate LID practices such as grassed swales and rain gardens between the roadways and buildings.*

*Given these design constraints, the Applicant contends that the requirements of Section 7.10.B.1 have been satisfied, as LID techniques such as open swales and rain gardens are not feasible for this development. However, the proposed design does incorporate decentralized stormwater treatment areas, which is one of the core principles of LID design.*

*The proposed stormwater management system maximizes groundwater recharge and water quality treatment to the maximum extent practicable. In addition, the project, as designed with this update, complies with Section 7.10.B.3.a.ii by providing infiltration and management of a runoff volume equivalent to, or greater than, one inch of runoff multiplied by the total post-construction impervious surface area of the new development site.*

**VHB Response:** The Applicant's response is noted. The Applicant has provided additional explanation regarding the decentralized LID practices evaluated, the site-design constraints limiting certain measures, and the way the proposed stormwater system maximizes recharge and water quality treatment. Consistent with VHB's response under Subdivision Regulations §7.10.B.1, this comment is considered addressed.

5. The Stormwater Report applies an infiltration rate of 8.27 inches per hour based on Rawls methodology for Sand, rather than the 2.41 inches per hour rate associated with Loamy Sand and supported by the submitted test pit data and soil evaluator classification. This higher infiltration rate is used throughout the South Neighborhood and directly affects the sizing and performance of the following stormwater BMPs:
  - Infiltration Basins: 1, 2, 3, and 4

- Subsurface Infiltration Systems: 1A, 1B, 2, 3, and 8

Use of the higher Rawls-based infiltration rate materially reduces required storage volumes and is therefore central to the feasibility and regulatory compliance of the proposed stormwater design.

Without field-verified confirmation of the assumed infiltration rate at the infiltrating soil layer, the Planning Board cannot confirm compliance with the Massachusetts Stormwater Management Standards, including recharge, treatment, and peak flow attenuation requirements. As currently presented, the stormwater design for the South Neighborhood relies on an infiltration rate that is not supported by the subsurface data included in the submission.

The Applicant has indicated, via email correspondence on February 2, 2026, with VHB and City Planning staff, that they intend to perform in-situ infiltration testing to evaluate whether the higher infiltration rate is appropriate for the proposed BMP locations.

The assumed infiltration rate is a foundational design parameter that directly governs BMP sizing, groundwater recharge volumes, peak flow attenuation, and overall compliance with the Massachusetts Stormwater Management Standards. Without field-verified confirmation in accordance with MassDEP guidance, the Planning Board cannot make a defensible finding that the stormwater system complies with State standards. If the assumed rate is not substantiated through in-situ testing, significant redesign of multiple infiltration basins and subsurface systems, including potential increases in footprint, grading changes, and layout modifications, may be required, which could materially affect site design, density, and overall project feasibility.

VHB recommends that the Planning Board require the Applicant to resolve this issue prior to approval by performing field infiltration testing in accordance with MassDEP Stormwater Handbook guidance, including the following:

- Conduct double-ring infiltrometer testing (or other DEP-accepted field method) at the actual infiltrating layer, located just above the seasonal high groundwater elevation for each proposed infiltration system;
- Perform at least one infiltration test for each infiltration basin and subsurface infiltration system listed above, or otherwise justify representative testing where multiple systems rely on identical soil strata;
- Apply the appropriate MassDEP-required reduction factor of 50% factor of safety to the measured in-situ saturated hydraulic conductivity to establish the design infiltration rate; to justify a design rate of 8.27 in/hr, field testing must demonstrate  $\geq 16.54$  in/hr at the actual infiltrating layer.
- Revise stormwater calculations, BMP sizing, and HydroCAD modeling as necessary based on the verified design infiltration rates.

Until field testing confirms that a higher infiltration rate is appropriate, the Planning Board should assume BMP sizing must use the lower rate supported by existing soil data. If Dynamic Field testing is performed, the Applicant must use 50% of the lowest measured in-situ saturated hydraulic conductivity at the actual infiltrating layer as the design rate.

*MEI Response: Double-ring infiltrometer testing has been performed in the requested locations, and the results are included in the revised stormwater report. The infiltration rates have been revised to reflect a minimum of*

*half of the rates obtained during the field testing. The infiltration rates exceed the Rawls Table of infiltration rates. In all locations where double-ring infiltrometer testing was performed, the appropriate MassDEP-required reduction factor of 50% was taken into account. The HydroCAD model has been updated accordingly.*

**(05/13/26) VHB Response:** VHB acknowledges that the Applicant has performed double-ring infiltrometer testing and revised the stormwater calculations accordingly. However, the submitted information remains insufficient to fully evaluate whether the revised infiltration rates are adequately supported and appropriately applied to the proposed BMPs.

Although test logs have been provided, the submission does not clearly identify the location of each test relative to the proposed infiltration systems, the existing and proposed grades at those locations, or the elevation of testing relative to the proposed bottom of each BMP. Without that information, VHB cannot confirm that testing was performed at the actual infiltrating layer governing design.

To allow full technical review, VHB requests that the Applicant submit an infiltration report that includes:

- The location of each infiltration test pit and double-ring infiltrometer test relative to each proposed infiltration BMP;
- Existing grades at each test location;
- The elevation of each test relative to the proposed bottom elevation of each infiltration system, and confirmation that the testing was conducted within the same stratum as the proposed infiltration layer; and
- Identification of who performed and witnessed the testing.

VHB further recommends that the Applicant PE-stamp the infiltration testing report documenting the full testing methodology, including pre-soak or saturation procedures, test duration, calculation methods and confirming whether the testing was conducted in general conformance with the MassDEP Stormwater Handbook and whether the results are representative of design conditions.

Given the notably high infiltration rates and variation reflected in the submitted logs, VHB recommends that the lowest verified design infiltration rate be used for design. VHB also recommends that infiltration rates be re-verified prior to construction at the actual BMP subgrade elevation, with additional testing to provide greater confidence that the final design is based on representative field conditions consistent with MassDEP guidance.

VHB notes, in addition to the comments above, that this issue was also discussed with the Applicant during the May 6, 2026 meeting. VHB emphasized that any fill placed beneath the infiltration systems should not become the limiting infiltration layer, and that the Applicant should provide updated infiltration basin details demonstrating that clean fill and system construction will maintain the assumed infiltration rate to the underlying native infiltrating soil. VHB further notes that use of the Rawls-based rate of 8.27 in/hr was discussed as a conservative interim design assumption for purposes of ongoing review, subject to confirmation that the constructed system and any fill beneath the BMPs will maintain that rate to the underlying native infiltrating soil.

*MEI Response: A detailed report with this requested information has been added to the stormwater report. Also, details and instructions on filling operations within infiltration basin areas are now provided in the erosion control plans.*

**VHB Response:** The Applicant's response is noted. The revised Stormwater Report includes the requested PE-stamped infiltration testing memorandum and supporting test-location information, and the erosion control plans include requirements for fill placement within infiltration areas. VHB notes that the HydroCAD model applies a design infiltration rate of 15 inches per hour to Systems 3D, 3E, and 3F, consistent with a 50% reduction of the measured 36-inch-per-hour rate; therefore, the 30-inch-per-hour value identified in the memorandum appears to be a typographical error. The memorandum date of June 1, 2028 also appears to be incorrect.

VHB further notes that, during the May 28, 2026 meeting with the Applicant and Amesbury staff, the parties discussed using the highest supportable design infiltration rates, consistent with MassDEP requirements, to reduce BMP footprints and associated impacts to wetland resource areas. The revised design appears to apply rates substantially lower than 50% of the measured in-situ rates at several locations, in some cases approximately one-quarter of the measured rate, without demonstrating that the corresponding basin footprints were reduced to the maximum extent practicable. Although use of a lower design rate is conservative from a hydraulic-design standpoint, it may result in larger stormwater facilities and greater resource-area impacts than necessary. This comment remains partially outstanding.

**VHB recommends that the Applicant correct the infiltration testing memorandum date and the design-rate reference for Systems 3D, 3E, and 3F, and provide a comparison of the measured, maximum MassDEP-supported, and modeled design infiltration rates for each BMP. Where modeled rates lower than 50% of the measured in-situ rate are retained, the Applicant should explain the engineering basis for the selected rate and demonstrate that the infiltration BMP footprints and associated resource-area impacts have been minimized to the extent practicable.**

6. Several proposed infiltration BMPs appear to provide limited vertical separation to Estimated Seasonal High Groundwater (ESHGW) and are also designed to provide both groundwater recharge and peak-rate attenuation. Under the Massachusetts Stormwater Handbook, where infiltration systems provide less than four (4) feet of separation to ESHGW (but at least two feet) and are used to attenuate runoff from the 10-year or greater 24-hour storm, a groundwater mounding analysis is required to demonstrate compliance with Stormwater Standard 3.

Based on review of the stormwater design, the following BMPs appear subject to this requirement:

- Subsurface Infiltration Systems: 1A, 2, 3, 7, and 8
- Surface Infiltration Basins: 1 and 4

However, no groundwater mounding analysis has been provided as part of the current submission.

Without a groundwater mounding analysis for infiltration systems with limited separation to ESHGW, the Planning Board cannot verify compliance with Stormwater Standard 3 or confirm that mounded groundwater conditions will not compromise system performance, groundwater quality, or adjacent resource areas.

VHB recommends that the Planning Board require the Applicant to provide a groundwater mounding analysis, prepared in accordance with the Massachusetts Stormwater Handbook, for the infiltration BMPs identified above. The analysis should confirm that mounded groundwater conditions remain compliant with Stormwater Standard 3 and that system performance assumptions used in the stormwater design are valid. The Applicant should also update the MassDEP Stormwater Checklist accordingly to document compliance.

*MEI Response: Groundwater mounding calculations have been provided and included in the revised stormwater report. In all cases, the peak groundwater mounding remains below the bottom of the infiltration facilities. This demonstrates compliance with Stormwater Standard 3.*

**(05/13/26) VHB Response:** VHB acknowledges that the Applicant has now provided a groundwater mounding analysis for the identified infiltration BMPs and that the revised stormwater report concludes that peak groundwater mounding remains below the bottom of the proposed infiltration systems.

However, VHB's review indicates that several of the key model inputs do not appear to have been selected or applied correctly. As submitted, the analysis does not provide a sufficient basis to confirm that the groundwater mounding evaluation is consistent with the Massachusetts Stormwater Handbook or representative of actual site conditions.

Specifically, the Recharge Rate (R) should not be entered as the assumed soil infiltration rate or saturated hydraulic conductivity. For groundwater mounding analyses, Recharge Rate (R) should represent the applied recharge flux to the subsurface, calculated as the design recharge volume divided by the effective infiltration area. The Infiltration Duration (t) should not be treated as an arbitrary input, but should reflect the actual stormwater loading period associated with the recharge event being evaluated. If the Applicant is using the Hantush USGS spreadsheet, Infiltration Duration (t) is typically entered as 1 day or greater to represent the stormwater loading period. Similarly, the assumed Initial Thickness of Saturated Zone ( $h_i(0)$ ) should not be assigned generically, but should be based on site-observed conditions and the available saturated thickness beneath each BMP. Typically using the vertical distance from Estimated Seasonal High Groundwater (ESHGW) to the bottom of the basin or infiltration system. While the assumed Hydraulic Conductivity (K) and Specific Yield (Sy) values appear generally reasonable, the basis for those assumptions has not been provided.

VHB recommends that the Planning Board require the Applicant to revise the groundwater mounding analysis as follows:

1. Recharge Rate (R): Recalculate R for each BMP as the applied recharge flux, using the design recharge volume divided by the effective infiltration area.
2. Infiltration Duration (t): Revise t so that it reflects the actual stormwater loading period associated with the event being evaluated for worst-case mounding. If using the Hantush USGS spreadsheet, t should typically be entered as 1 day or greater.
3. Initial Thickness of Saturated Zone ( $h_i(0)$ ): Recalculate  $h_i(0)$  for each BMP based on observed site conditions and the available saturated thickness below the proposed infiltration elevation. Typically using the vertical distance from Estimated Seasonal High Groundwater (ESHGW) to the bottom of the basin or infiltration system.
4. Hydraulic Conductivity (K) and Specific Yield (Sy): Provide the basis for the selected values used in the analysis.

Revised calculations and supporting documentation should be submitted to confirm that the groundwater mounding analysis is based on correctly derived model inputs and is representative of proposed field conditions.

***MEI Response:** The mounding analysis has been updated per comments except for item 3. Contrary to the VHB comment, the initial saturated zone should be from estimated seasonal high groundwater down to ledge or restrictive zone. As typical, this thickness is estimated upon the best available information.*

**VHB Response:** The Applicant's response is noted. The groundwater mounding calculations have been revised to address the recharge rate, infiltration duration, hydraulic conductivity, and specific-yield comments. VHB also acknowledges the Applicant's clarification that the initial saturated-zone thickness is measured from ESHGW to the underlying ledge or restrictive layer. Based on the revised calculations and information provided, this comment is considered addressed.

7. The Massachusetts Stormwater Handbook (Volume 2, Chapter 2 – Infiltration Practices) recommends a minimum of one soil boring or test pit per 5,000 square feet of infiltration basin area, with a minimum of three test pits per infiltration basin, to adequately characterize subsurface soil conditions and seasonal high groundwater. Based on review of the submitted materials, fewer than three test pits are associated with Subsurface Infiltration Systems 3 and 5 and Surface Basins 2 and 3, which does not meet the Handbook's recommended minimum testing density.

While the available test pit data appears to show a degree of consistency in soil classification and groundwater observations across portions of the site, the limited number of test pits at these specific BMP locations introduces uncertainty regarding localized variability in soil conditions and groundwater elevations at the infiltrating layer.

Without the minimum recommended number of test pits at each infiltration BMP location, the Planning Board cannot confirm that subsurface conditions and seasonal high groundwater have been adequately characterized, introducing uncertainty into infiltration performance assumptions and compliance with the Massachusetts Stormwater Management Standards.

VHB recommends that the Planning Board require the Applicant to complete additional confirmatory test pits for Subsurface Infiltration Systems 3 and 5 and Surface Basins 2 and 3 to better characterize subsurface conditions and groundwater elevations at the proposed infiltration locations. The Applicant should acknowledge that if additional testing identifies conditions inconsistent with the stormwater design assumptions, revisions to the stormwater system and re-review may be necessary to demonstrate compliance with the Massachusetts Stormwater Management Standards.

***MEI Response:** Test pits have previously been conducted directly adjacent to the infiltration areas mentioned above. Due to the evolution of the project, the basin locations were slightly adjusted and some of the test pits now fall outside of the basin. It is Millennium Engineering's professional opinion that sufficient test pits have been performed to accurately design the basins.*

**(05/13/26) VHB Response:** VHB acknowledges the Applicant's response that test pits were previously performed adjacent to these BMP locations and that subsequent design refinement shifted some basin footprints relative to the original testing locations. While the available test pit data may indicate generally consistent subsurface conditions in these portions of the site, fewer than the minimum recommended number

of test pits still appear to be associated with Subsurface Infiltration Systems 3 and 5 and Surface Basins 2 and 3 as currently designed.

VHB recommends that the Planning Board condition any approval on at least one additional confirmatory test pit being performed for each of these BMPs at the final BMP location, particularly for Subsurface Infiltration System 3, where the design appears to rely on a minimum two (2) foot separation to groundwater. If confirmatory testing identifies conditions materially different from the current design assumptions, the stormwater design should be revised and submitted for further review as necessary.

*MEI Response: The applicant does not have any issue with this condition.*

**VHB Response:** The Applicant's response is noted. The Applicant has agreed to the recommended condition requiring confirmatory subsurface testing at the final BMP locations. This comment is considered addressed subject to inclusion of an appropriate condition.

**VHB recommends that any approval require at least one additional confirmatory test pit at each of Subsurface Infiltration Systems 3 and 5 and Surface Basins 2 and 3 prior to construction of the respective BMP. If testing identifies conditions materially different from the design assumptions, the stormwater design should be revised and submitted for further review.**

8. The stormwater plans reference OCS-18; however, a corresponding detail for OCS-18 is not included in the plan set.

VHB recommends that the Planning Board require the Applicant to provide the missing OCS-18 detail or revise the plans to remove the reference, as appropriate.

*MEI Response: The label of the detail has been revised to show OCS 18.*

**(05/13/26) VHB Response:** VHB acknowledges the Applicant's response, however, based on review of the detail, the structure labeled OCS-18 does not appear to function as an outlet control structure. As shown, the invert in and invert out appear to be the same elevation, and no internal wall or other outlet control feature is shown.

VHB recommends that the Planning Board require the Applicant to either revise the detail and plan information to show how OCS-18 functions as an outlet control structure, or relabel the structure consistently with its actual design and function.

*MEI Response: Based upon the May meeting with OCED, Planning, Conservation and peer review teams, the stormwater calculations have been updated using the isolated land subject to flooding for deletion satisfying Standard 2. The use of the ILSF for this purpose was confirmed at the June 1st Conservation Commission meeting. Based upon these discussions, changes were made to the North Neighborhood stormwater design along with the outlet controls.*

**VHB Response:** The Applicant's response is noted. The revised North Neighborhood stormwater design no longer includes OCS-18, and the updated outlet-control details have been revised accordingly. This comment is considered addressed.

9. The stormwater report does not include Test Pit 19-C, and Test Pit 19-A appears to be duplicated within the test pit documentation.

VHB recommends that the Planning Board require the Applicant to correct the test pit documentation by including Test Pit 19-C and clarifying or correcting the duplicate 19-A reference.

MEI Response: *The test pits are labeled 19A019C. The 19C label has moved to clarify the label.*

**(05/13/26) VHB Response:** VHB acknowledges the Applicant's response; however, the test pit documentation still does not appear to clearly resolve the missing reference to Test Pit 19-C or the duplicate reference to Test Pit 19-A.

VHB continues to recommend that the Planning Board require the Applicant to correct and clarify the test pit documentation accordingly.

MEI Response: *Test Pit 19 Series is now corrected.*

**VHB Response:** The Applicant's response is noted. The revised stormwater report corrects the Test Pit 19 series documentation, including the references to Test Pits 19-A and 19-C. This comment is considered addressed.

10. For Infiltration Basin 1, the cross-section detail identifies a bottom elevation of 47.00 feet, while the HydroCAD model lists the bottom elevation as 46.50 feet.

VHB recommends that the Planning Board require the Applicant to reconcile the bottom elevation for Infiltration Basin 1 across the plans and HydroCAD model and update the documents accordingly.

MEI Response: *The plans have been revised so the model and plans match.*

**(05/13/26) VHB Response:** VHB acknowledges the Applicant's response; however, the revision does not appear to resolve the underlying issue. While the plans and HydroCAD model now appear to match with a bottom elevation of 46.50 feet for Infiltration Basin 1, the revised model also appears to show groundwater at approximately 45.00 feet. As a result, a basin bottom elevation of 46.50 feet would not maintain the minimum required two (2) feet of separation to groundwater.

It appears that the original plan detail showing a bottom elevation of 47.00 feet may have been correct, and that the model should have been revised accordingly rather than lowering the basin bottom elevation on the plans.

VHB recommends that the Planning Board require the Applicant to reconcile the plans, model, and supporting calculations so that the bottom elevation of Infiltration Basin 1 is consistent across all documents and maintains the required separation to groundwater. Any resulting changes to basin sizing, storage, or stormwater performance should also be reflected in the revised design and calculations.

MEI Response: *Basin 1 has been moved down slope with the plan updates, based upon TP-15 at elevation 64.9 and 33" to ESHGW the high groundwater is at elevation 62.2. The bottom of basin 1 is set at elevation 65.5 in the plan and in the model.*

**VHB Response:** The Applicant's response is noted. Infiltration Basin 1 has been relocated, and the revised plans and HydroCAD model identify a basin bottom elevation of 65.5 feet. Based on the reported ESHGW elevation of approximately 62.2 feet at TP-15, the revised design provides more than two feet of vertical separation. This comment is considered addressed.

11. The proposed constructed (pocket) wetlands appear to rely, in part, on groundwater interaction to maintain required marsh hydroperiods and vegetation viability. Review of the plans indicates that some constructed wetlands set the normal pool elevation at or near the Estimated Seasonal High Groundwater (ESHGW), while other constructed wetlands do not appear to intersect groundwater at all. In addition, the plans include notes delineating high marsh, low marsh, and micropool areas and reference placement of loam and seed mixes within these zones; however, the submitted materials do not demonstrate that the proposed planting zones are supported by sustained hydrologic conditions consistent with the Massachusetts Stormwater Handbook "pond-scaping" method.

Under the Massachusetts Stormwater Handbook (Volume 2, Chapter 2), constructed wetlands supported by groundwater must demonstrate, through a Thornthwaite-based water budget, that water inputs exceed losses and that marsh zones remain wetted throughout the growing season. Where the outlet crest defining the normal pool is set at the ESHGW elevation, seasonal groundwater recession may result in prolonged drawdown below the outlet crest during drier months. Similarly, constructed wetlands that do not intersect groundwater may experience insufficient hydroperiods unless alternative hydrologic support is provided. The current submission does not include a water budget or other analysis demonstrating that the proposed marsh zones will maintain appropriate hydroperiods over time.

In addition, the submitted materials do not clearly demonstrate that the constructed wetlands meet the minimum 2:1 length-to-width (flow path) ratio, in each constructed wetland aside from constructed wetland 3, recommended by the Massachusetts Stormwater Handbook to prevent hydraulic short-circuiting and ensure effective water quality treatment.

Without a demonstrated water budget and confirmation of required flow path geometry, the Planning Board cannot verify that the proposed constructed wetlands will maintain sustained hydroperiods, meet MassDEP pond-scaping criteria, or provide reliable long-term water quality treatment in accordance with the Massachusetts Stormwater Handbook.

VHB recommends that the Planning Board require the Applicant to supplement the existing basin details by demonstrating that the proposed constructed wetlands will function as intended under the Massachusetts Stormwater Handbook. While the plans provide normal pool elevations, top of berm elevations, emergency spillway elevations, 100-year storm water surface elevations, and details identifying high marsh, low marsh, and micropool zones, additional documentation is needed to confirm that these features are supported by sustained hydrologic conditions.

At a minimum, the Applicant should provide a Thornthwaite-based water budget accounting for seasonal groundwater fluctuations to demonstrate that required marsh hydroperiods will be maintained throughout the growing season, particularly where the normal pool is set at or near the ESHGW or where constructed wetlands do not intersect groundwater. The Applicant should also confirm that each constructed wetland meets the minimum 2:1 flow path length-to-width ratio recommended by the Massachusetts Stormwater Handbook and that the proposed planting design follows the MassDEP pond-scaping method, with vegetation zones matched to anticipated long-term hydroperiods.

*MEI Response: Water budget calculations utilizing the Thornthwaite method have been included with this submittal. The calculations provided demonstrate that the proposed constructed wetlands will function as intended under the Massachusetts Stormwater Handbook.*

**(05/13/26) VHB Response:** VHB acknowledges that the Applicant has now provided Thornthwaite-based water budget calculations for the proposed constructed wetlands. Based on review of the revised stormwater report, the additional analysis appears to sufficiently address the hydroperiod / water budget portion of this comment.

However, the submission still does not appear to clearly demonstrate that each constructed wetland meets the minimum recommended 2:1 flow path length-to-width ratio identified in the Massachusetts Stormwater Handbook. That recommendation is intended to reduce the potential for hydraulic short-circuiting and to promote more effective distribution of flow through the wetland treatment area, thereby improving pollutant removal and long-term treatment performance. If the Applicant proposes not to meet that recommended geometry, the Planning Board should understand that the wetland may not function as effectively as intended for water quality treatment.

Accordingly, this item appears to be only partially addressed. VHB recommends that the Planning Board require the Applicant to provide plan-based confirmation that each constructed wetland meets the minimum recommended 2:1 flow path length-to-width ratio, or technical justification where that criterion is not met. If the Applicant proposes to deviate from this recommendation, the submission should explain why the alternative geometry is still expected to provide acceptable treatment performance.

*MEI Response: All constructed wetlands have been removed from the plans.*

**VHB Response:** The Applicant's response is noted. The constructed wetlands have been removed from the revised plans; therefore, the hydroperiod, pond-scaping, and flow-path concerns identified in this comment are no longer applicable. This comment is considered addressed.

12. The MassDEP Stormwater Checklist indicates that an Operation and Maintenance (O&M) Plan and a Long-Term Pollution Prevention Plan are included as part of the stormwater submission; however, these documents were not provided within the Stormwater Report or as separate attachments.

Without the referenced Operation and Maintenance Plan and Long-Term Pollution Prevention Plan, the Planning Board cannot verify compliance with the Massachusetts Stormwater Management Standards or ensure that stormwater BMPs will be properly maintained and operated over the long term.

VHB recommends that the Planning Board require the Applicant to submit the referenced Operation and Maintenance Plan and Long-Term Pollution Prevention Plan, or clearly identify where these documents are provided within the submission, to demonstrate compliance with the Massachusetts Stormwater Management Standards.

*MEI Response: The O&M manuals were provided under separate covers and will be re-submitted as part of this submittal. The O&M manuals provided demonstrate compliance with the Massachusetts Stormwater Management Standards.*

**(05/13/26) VHB Response:** VHB acknowledges the Applicant's response and the submission of separate Operation and Maintenance and Long-Term Pollution Prevention materials. These documents appear to address the core substance of the original comment in part; however, several items still appear to require clarification or completion to fully align with the MassDEP Stormwater Checklist and the type of documentation typically included in an O&M / pollution prevention submission.

At a minimum, the Applicant should: (1) provide an executed Illicit Discharge Compliance Statement, or clearly identify when it will be submitted if deferred consistent with the MassDEP Stormwater Checklist; (2) provide or clearly reference BMP location plans and device IDs that correspond to the inspection and maintenance forms; (3) include manufacturer operation and maintenance information for proprietary treatment devices, including the CDS units; and (4) further coordinate the inspection and maintenance summary so that BMP responsibilities, frequencies, maintenance triggers, and long-term responsible parties are clearly documented and consistent with the project's proposed ownership and maintenance structure.

VHB recommends that the Planning Board require the Applicant to finalize and supplement the Operation and Maintenance Plan and Long-Term Pollution Prevention Plan accordingly so that the documents are complete, internally coordinated, and consistent with the Massachusetts Stormwater Management Standards.

*MEI Response: Applicant is willing to accept as a condition of approval a requirement to submit a final Operation and Maintenance Plan and Long-Term Pollution Prevention Plan consistent with the Massachusetts Stormwater Management Standards prior to the commencement of construction.*

**VHB Response:** The Applicant's response is noted. The Applicant proposes to finalize the Operation and Maintenance Plan and Long-Term Pollution Prevention Plan after Site Plan Approval and prior to construction. Because the current documents remain incomplete with respect to the items identified in VHB's prior response, this comment remains partially outstanding.

VHB also notes that the certified MassDEP Stormwater Checklist does not appear to accurately reflect the current stormwater design, supporting documentation, or permit status. Apparent inconsistencies include references to constructed stormwater wetlands that have been removed; the selected recharge and infiltration-sizing methods; the status of groundwater-mounding, proprietary BMP, construction-period pollution-prevention, NPDES permit, O&M, Long-Term Pollution Prevention, and Illicit Discharge Compliance documentation; and statements indicating that certain materials are included or attached when they remain separate, incomplete, or deferred.

**VHB recommends that the Planning Board determine whether completion of the O&M Plan and Long-Term Pollution Prevention Plan may be accepted as a condition of approval. If accepted, the condition should require final documents addressing the outstanding items identified above and approval by the City prior to issuance of the Building Permit. VHB further recommends that the Applicant revise and re-certify the MassDEP Stormwater Checklist following completion of the stormwater revisions and supporting documents so that each checked item accurately reflects the final design and identifies the corresponding report section, plan sheet, calculation, or attachment.**

13. The project will disturb more than one acre of land and will therefore require coverage under the EPA NPDES Construction General Permit (CGP), including preparation of a Stormwater Pollution Prevention Plan (SWPPP). These documents were not included in the submission, and no indication was provided regarding the Applicant's schedule for obtaining permit coverage prior to construction.

Without confirmation of NPDES Construction General Permit coverage and an approved SWPPP, the Planning Board cannot ensure that federally required erosion and sediment control measures will be in place to prevent sedimentation and downstream water quality impacts during construction.

VHB recommends that the Planning Board require that the Applicant provide the Planning Board with a copy of the completed NPDES Notice of Intent (NOI) and the fully developed SWPPP.

***MEI Response:** Given that the project is still in the permitting phase, a NPDES eNOI and SWPPP have not yet been prepared. Many of the required items in these documents include contractor-specific information and schedules, which are not yet known. In other projects approved by the City, a condition has been included requiring that, prior to construction, a copy of the SWPPP and NPDES permit be submitted to the City for review.*

**(05/13/26) VHB Response:** VHB acknowledges the Applicant's response and understands that final NPDES eNOI and SWPPP materials are often completed closer to construction, once contractor-specific sequencing and schedules are finalized.

However, this comment should remain partially outstanding. Given the extent of proposed disturbance and earth filling, the proximity of construction activity and stormwater BMPs to wetland resource areas, and the potential for phased construction, VHB recommends that the Applicant provide a draft SWPPP for review prior to approval. The draft SWPPP should demonstrate, at a planning level, how construction-phase runoff, sediment control, temporary stabilization, construction access, stockpiling, dewatering, and interim drainage conditions will be managed.

VHB also notes that the Amesbury Conservation Commission review remains ongoing, including review of the NOI and stormwater design. Any Planning Board approval should be conditioned on consistency with the final Order of Conditions, including any required revisions to erosion controls, temporary BMPs, construction sequencing, or stormwater management measures.

VHB recommends that the Planning Board require the Applicant to submit a draft SWPPP prior to approval and, prior to construction, submit the final NPDES NOI and fully developed SWPPP updated to reflect contractor-specific sequencing, construction methods, and any requirements of the Amesbury Conservation Commission Order of Conditions.

***MEI Response:** The Applicant is willing to accept as of approval a requirement to submit a draft NPDES Construction Permit NOI and SWPPP to the Planning Department for review prior to the commencement of construction.*

**VHB Response:** The Applicant's response is noted. The Applicant proposes to submit the draft NPDES Construction Permit NOI and SWPPP after Site Plan Approval and prior to construction. This issue is addressed in VHB's response under Section XI.Q.10.5.g, Erosion Control.

**Consistent with that response, VHB continues to recommend that a planning-level draft SWPPP be provided prior to Site Plan Approval, with the final NOI and SWPPP submitted prior to commencement of construction. This comment remains outstanding pending resolution of the referenced erosion-control comment.**

14. The Massachusetts Stormwater Handbook requires that infiltration systems fully dewater within 72 hours to prevent prolonged saturation, ensure pollutant removal performance, and avoid mosquito breeding conditions. While infiltration rates and basin performance are discussed elsewhere in the stormwater report, the submission does not clearly document or summarize drawdown time calculations demonstrating that all proposed infiltration BMPs meet the 72-hour drawdown requirement under the assumed design infiltration rates.

Without documented drawdown time calculations, the Planning Board cannot verify compliance with the 72-hour dewatering requirement of the Massachusetts Stormwater Handbook or confirm that the proposed infiltration BMPs will function properly without prolonged ponding or performance degradation.

VHB recommends that the Planning Board require the Applicant to provide drawdown time calculations demonstrating that each proposed infiltration BMP fully dewateres within 72 hours, consistent with the Massachusetts Stormwater Handbook, using the final approved design infiltration rates.

*MEI Response: Drawdown calculations were provided in the Stormwater Report within the Recharge Volume section. The calculations demonstrate that each proposed infiltration BMP fully dewateres within 72 hours, consistent with the Massachusetts Stormwater Handbook.*

**(05/13/26) VHB Response:** VHB acknowledges the Applicant's response; however, VHB still does not see drawdown time calculations in the Recharge Volume section of the Stormwater Report. While that section identifies the required recharge volume and total recharge provided for each infiltration BMP, it does not appear to include actual dewatering time calculations demonstrating that each proposed infiltration BMP fully drains within 72 hours.

VHB recommends that the Planning Board require the Applicant to provide explicit drawdown time calculations for each proposed infiltration BMP, based on the final approved design infiltration rates and BMP geometry, demonstrating compliance with the 72-hour dewatering requirement of the Massachusetts Stormwater Handbook.

*MEI Response: Drawdown calculations have been added to the stormwater calculations. All the basins drain well below the 72-hour requirement.*

**VHB Response:** The Applicant's response is noted. The revised stormwater calculations now include explicit drawdown calculations for the proposed infiltration BMPs and indicate that each system dewateres within the 72-hour criterion. Based on the information provided, this comment is considered addressed.

15. While pretreatment measures are shown, the submission does not clearly document pretreatment sizing, including confirmation that required sediment forebay volumes are provided and accounted for in the stormwater calculations, consistent with the Massachusetts Stormwater Handbook.

Without documented pretreatment sizing and confirmation of required sediment forebay volumes, the Planning Board cannot verify compliance with the Massachusetts Stormwater Handbook or ensure that downstream BMPs will be adequately protected from sediment loading and premature failure.

VHB recommends that the Planning Board require the Applicant to demonstrate that pretreatment measures are properly sized in accordance with the Massachusetts Stormwater Handbook and that pretreatment volumes are clearly identified in the plans and calculations.

*MEI Response: Pretreatment for most of the development consists of deep sump, hooded catch basins and water quality units. The minimum TSS removal for this treatment train is typically considered to be 44%, meeting the pretreatment requirement for infiltration basins with rapid infiltration rates. This demonstrates that the pretreatment measures are properly sized in accordance with the Massachusetts Stormwater Handbook.*

**(05/13/26) VHB Response:** VHB acknowledges the Applicant's response regarding pretreatment through deep sump hooded catch basins and water quality units. However, the response addresses assigned TSS

removal credit rather than pretreatment sizing. The submission still does not clearly document whether the proposed pretreatment measures provide the required sediment storage / pretreatment volume consistent with the Massachusetts Stormwater Handbook, or where those volumes are accounted for in the plans and calculations.

Accordingly, VHB cannot confirm from the current submission that pretreatment has been properly sized to protect downstream infiltration BMPs from sediment loading and premature clogging.

VHB recommends that the Planning Board require the Applicant to provide pretreatment sizing documentation, including identification of the required pretreatment volume or storage capacity for each applicable system, including each Water Quality Unit Sizing, and to clearly show where that pretreatment is provided in the plans and supporting calculations.

*MEI Response: The requested information is now attached to the stormwater report.*

**VHB Response:** The Applicant's response is noted. The revised Stormwater Report now includes Water Quality Unit sizing calculations identifying the tributary impervious area, water-quality flow rate, and selected proprietary unit size for each proposed treatment structure. Based on the information provided, the requested pretreatment sizing documentation has been provided. This comment is considered addressed.

#### *Additional Comment(s) May 13, 2026*

20. The Stormwater Report states that the hydrologic model uses Northeast Regional Climate Center (NRCC) precipitation data for the 2-year, 10-year, and 100-year, 24-hour storm events, corresponding to 3.10 inches, 4.83 inches, and 8.94 inches, respectively. VHB notes that the MassDEP Stormwater Handbook does not appear to explicitly require use of NOAA Atlas 14; however, NOAA Atlas 14 represents the current nationally standardized precipitation-frequency dataset and is commonly used in Massachusetts stormwater modeling. The NOAA Atlas 14 precipitation depths for the project vicinity differ from the NRCC values used in the model, including higher values for certain storm events.

VHB recommends that the Planning Board require the Applicant to either revise the hydrologic and hydraulic modeling to use NOAA Atlas 14 precipitation depths for the project location or provide written justification, subject to review and acceptance by the City, for using NRCC precipitation data in lieu of NOAA Atlas 14. The Applicant should also clearly document the rainfall source, selected location/grid point, storm distribution, and precipitation depths used in the final HydroCAD model.

*MEI Response: The calculations are based upon the NOAA Atlas 14 numbers as published within the Hydrocad model software. There are slight variations from the numbers published through the NOAA website. These variations are insignificant and would not impact the overall design and performance of the proposed drainage system.*

**VHB Response:** The Applicant's response is noted. The Applicant has clarified that the precipitation depths used in the HydroCAD model are based on NOAA Atlas 14 data incorporated into the software and that the minor differences from the values published through the NOAA website are not expected to materially affect the design. Based on this clarification, this comment is considered addressed.

21. The plans do not appear to include an emergency overflow detail with sufficient information. In addition, the apparent overflow location appears to conflict with a proposed pedestrian trail, and the submission does not clearly demonstrate whether that crossing is intended to be safely traversable by pedestrians.

Without an emergency overflow detail and supporting design information, the Planning Board cannot verify that overflow will be safely conveyed or that the trail crossing is appropriate under storm conditions.

VHB recommends that the Planning Board require the Applicant to provide an emergency overflow with sufficient detail, including length, width, material (looks to be grassed on detail and riprap on plans) and clarify how the trail crossing is intended to function during overflow events, or revise the design accordingly.

*MEI Response: The emergency overflow detail has been added to the plans.*

**VHB Response:** The Applicant's response is noted. The revised plans include an emergency overflow detail identifying the spillway material and geometry and show the pedestrian trail crossing the overflow by means of a raised timber bridge above the modeled 100-year water surface elevation. The detail indicates a bridge height of 30 inches above the adjacent surface. However, at several locations, including Basins 3B and 3D, the stormwater outfall appears to discharge upstream of the proposed trail alignment, which may concentrate flow toward the trail and create a potential for erosion, washout, or recurring maintenance. This comment remains partially outstanding.

**VHB recommends that the Applicant relocate the trail upstream of the outfall locations at Basins 3B and 3D, similar to the configuration shown at Basin 1, or otherwise demonstrate through grading and erosion-protection details that discharge from the outfalls will not adversely affect the trail. VHB further recommends that the Applicant confirm that the vertical drop at the timber bridge does not exceed 30 inches at any point within 36 inches horizontally of the bridge edge; otherwise, guards should be provided in accordance with the applicable building code.**

22. A handful of catch basins are located at the corners of parking areas. While MassDEP does not prohibit corner inlets, the Stormwater Handbook emphasizes that catch basin siting should support effective maintenance and minimize clogging. Corners commonly accumulate snow and debris, which can lead to blocked grates, increased sediment loading, and reduced pretreatment effectiveness unless adequately protected and frequently maintained.

VHB recommends that the Planning Board requests that the Applicant evaluate whether these corner inlets are appropriate long-term locations or whether shifting them slightly out of the corners would reduce maintenance burdens.

*MEI Response: The catch basins have been moved from curb corner inlet conditions.*

**VHB Response:** The Applicant's response is noted. The revised plans relocate the catch basins away from the parking-area curb corners. This comment is considered addressed.

23. Several proposed outlet control structures appear to rely on 1-inch orifices for flow control. Given the surrounding landscaped and wooded conditions, VHB is concerned that openings of this size may be highly susceptible to clogging from leaf litter, pine needles, small branches, cones, and other debris.

If the proposed orifices clog, the outlet structures may not function as modeled, which could affect drawdown performance, stage-storage-routing assumptions, and overflow behavior during storm events.

VHB recommends that the Planning Board require the Applicant to provide technical justification for the use of 1-inch orifices, including how clogging risk has been evaluated and what anti-clogging measures are provided. VHB notes that its typical design practice is to avoid outlet orifices smaller than 4 inches due to clogging concerns, and VHB would not support an orifice this small without clear supporting justification. If such justification cannot be provided, the Applicant should revise the outlet control design and supporting calculations accordingly.

*MEI Response: Due to the existing runoff rate of only 0.13 cfs a smaller orifice is required. Note that the orifice has been increased to a 1.7" diameter. There will be a trash rack with 1" square openings to protect this orifice. Also, specific details for maintenance will be added to the operation and maintenance manual.*

**VHB Response:** The Applicant's response is noted. The outlet orifice has been increased to 1.7 inches, and the Applicant has clarified that the smaller opening is necessary due to the low existing discharge rate. A trash rack with 1-inch openings is proposed to reduce the potential for debris to reach and obstruct the orifice. Based on the revised design and information provided, this comment is considered addressed.

**VHB recommends that the final Operation and Maintenance Plan include specific inspection and cleaning requirements for the trash rack and outlet orifice, including inspection following significant storm events and prompt removal of accumulated debris.**

## General Engineering & Plan Comments

This section includes comments on site-related design and plan completeness that are not specifically covered under zoning, stormwater, or wetlands compliance. VHB has reviewed the overall site layout, grading, access, and plan organization for general conformance with sound engineering practices and the City's expectations for site plan submittals. Comments in this section are intended to improve plan clarity, safety, and coordination between site elements.

Due to the extent and scale of the comments outlined below, the Stormwater and General Comments sections are limited to high-level technical and regulatory observations. Detailed, sheet-by-sheet and micro-level review has not been completed at this time, as substantive plan revisions and potential layout modifications are anticipated in response to these comments.

VHB will provide additional detailed comments upon submission of revised plans reflecting any material changes.

1. Under NFPA-1, The submitted plans depict internal roadways, building access points, and fire hydrant locations; however, the materials do not clearly indicate whether the proposed site layout, access geometry, turning areas, and hydrant spacing have been reviewed and approved by the Amesbury Fire Department.

Without documented Fire Department review and concurrence, the Planning Board cannot confirm that the proposed roadway geometry, turning radii, and hydrant spacing meet NFPA-1 requirements or ensure that adequate emergency access and fire protection will be provided.

VHB recommends that the Planning Board require the Applicant to submit written confirmation from the Amesbury Fire Department indicating that the proposed plans have been reviewed and are acceptable from a fire access and protection standpoint. Any Fire Department comments or required modifications related to roadway geometry, emergency access routes (including secondary access), hydrant locations, fire lanes, or fire

protection infrastructure should be incorporated into the plan set prior to approval or issuance of building permits.

***MEI Response:** The project layout was reviewed by the Amesbury Fire Department during the Technical Review Meeting process. The Applicant is currently reviewing the final layout with the Amesbury Fire Department and expects a letter from the Amesbury Fire Department prior to completion of the Site Plan Review process.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that the project layout was reviewed by the Amesbury Fire Department during the Technical Review Meeting process and that the Applicant is continuing coordination with the Fire Department regarding the final layout.

This comment is considered partially addressed. Written confirmation from the Amesbury Fire Department has not yet been provided.

VHB recommends that the Planning Board require the Applicant to submit written Fire Department confirmation prior to completion of the Site Plan Review process, or otherwise require such confirmation as a condition of approval, if acceptable to the Planning Board. Any Fire Department comments or required modifications related to roadway geometry, emergency access, secondary access, hydrant locations, fire lanes, or fire protection infrastructure should be incorporated into the final plan set.

***MEI Response:** Attached is letter from the Amesbury Fire Chief giving favorable review of roadway geometry, emergency access, secondary access, hydrant locations, fire lanes, or fire protection infrastructure.*

**VHB Response:** The Applicant's response is noted. The submitted letter from the Amesbury Fire Chief provides a favorable review of the proposed roadway geometry, emergency and secondary access, hydrant locations, fire lanes, and fire-protection infrastructure. Based on the Fire Department's review, this comment is considered addressed.

2. The proposed development includes multiple neighborhoods and shared infrastructure systems, including utilities, private roadways, stormwater facilities, open space, and other common site features. However, the submitted materials do not clearly identify the location, extent, or purpose of proposed easements necessary to support shared utilities and infrastructure, particularly where systems serve more than one neighborhood or cross property boundaries.

Without clearly defined and documented easements for shared infrastructure, the Planning Board cannot ensure that utilities, drainage systems, accessways, and other common facilities will have the legal access and maintenance rights necessary for long-term operation and enforceability.

VHB recommends that the Planning Board require the Applicant to identify all proposed easements on the plans, including utility, access, drainage, and maintenance easements associated with shared infrastructure between neighborhoods, and to clarify how such easements will be established and maintained as part of the project.

***MEI Response:** The Rocky Hill development has been planned such that the South and North Neighborhoods can be built and operated with a minimal amount of shared infrastructure and need for cross-easements. The boulevard road is the principal shared improvement, in which all principal utility mains are located. Unless and until the boulevard road is dedicated to the City, the North Neighborhood landowner shall also own the proposed boulevard lot and will be chiefly responsible for its construction and maintenance. The South*

*Neighborhood landowner and residents shall have full access and rights to the use and connection to the boulevard by easement agreement to be created.*

*A recorded easement agreement is in place with the Amesbury Animal Hospital for the emergency access road. The owner of 283 Elm Street has also agreed to grant an easement for the emergency access upon the Applicant's acquisition of the development parcels.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that the project has been planned to minimize shared infrastructure between the North and South Neighborhoods, that the boulevard road is the principal shared improvement, and that easements are anticipated for South Neighborhood access and utility connections. VHB also acknowledges the Applicant's statement that an easement agreement is recorded with the Amesbury Animal Hospital and that an additional emergency access easement is anticipated from the owner of 283 Elm Street.

This comment is partially addressed. The Applicant should identify the location, limits, and purpose of all required easements on the plans, including access, utility, drainage, maintenance, and emergency access easements.

VHB recommends that the Planning Board require the Applicant to provide draft or final easement documentation confirming the rights and responsibilities for construction, access, use, maintenance, repair, and replacement of shared infrastructure prior to final endorsement, or as otherwise deemed appropriate by the Planning Board. Upon the finalization of these easements, documentation that these easements are recorded at the appropriate registry of deeds should be provided to the Planning Board.

*MEI Response: Other than the boulevard road and utilities within the boulevard road and the trail system, there is no material shared infrastructure. Each neighborhood has been designed to stand alone. Applicant is willing to accept a condition of approval a requirement that Applicant identify on the plans all proposed easements and to clarify how such easements will be established and maintained as part of the project prior to the issuance of a building permit for the first dwelling unit.*

**VHB Response:** The Applicant's response is noted. The Applicant has clarified that the boulevard roadway, utilities within the boulevard, and trail system constitute the principal shared infrastructure and has agreed to identify the required easements on the plans. However, the easement locations, limits, purposes, and associated rights and responsibilities have not yet been documented. This comment remains partially outstanding.

**VHB recommends that the Applicant identify all required access, utility, drainage, trail, maintenance, and emergency-access easements on the plans and provide draft easement documentation establishing the applicable construction, use, maintenance, repair, and replacement responsibilities. The Planning Board should determine the appropriate timing for execution and recording; however, the required easements should be established before issuance of any permit or commencement of work dependent upon the applicable shared infrastructure.**

3. The submitted plans include typical roadway cross sections for internal streets; however, cross sections depicting roadway segments with parallel parking are not provided. As a result, it is unclear how pavement width, curb placement, parking offsets, drainage, and pedestrian clearances are accommodated in areas where parallel parking is proposed.

Without roadway cross sections for segments with parallel parking, the Planning Board cannot verify that pavement widths, drainage, curb offsets, and pedestrian clearances function safely and comply with applicable dimensional and design standards.

VHB recommends that the Planning Board require the Applicant to provide typical roadway cross sections for all street conditions where parallel parking is proposed, including pavement widths, curb types, parking dimensions, drainage elements, and adjacent sidewalk or buffer widths.

*MEI Response: The typical roadway section is sloped to the curbline where parallel parking is located. That section has been added to the typical roadway sections.*

**(05/13/26) VHB Response:** The roadway typical sections should be more clearly coordinated with the site layout plans. Specifically, the road names, station ranges, and applicable street segments should be labeled consistently between the typical sections and the site layout/profiles, such as identifying "Road A / Central Boulevard" and the station limits where each section applies.

VHB also notes that the plans appear to reference an on-street parking subsection rather than providing full typical sections for each roadway segment with parallel parking.

VHB recommends that the Planning Board require the Applicant to clarify the applicability of each typical section and on-street parking subsection to the corresponding roadway segments. VHB defers to the Planning Board as to whether the current level of typical section detail is sufficient for Site Plan Review, provided the final construction documents clearly depict the full roadway section for each condition.

*MEI Response: The roadway cross section has been updated to reflect the gutter line flow running along edge of travel way versus the curbline in parking situations.*

**VHB Response:** The Applicant's response is noted. The revised plans include roadway cross sections for the principal street conditions and a separate on-street parking lane section clarifying the proposed parking width, curb relationship, gutter flow line, sidewalk, and landscaped buffer configuration. The drawings do not identify the specific roadway segments or station ranges where each section applies; however, the information provided appears sufficient to illustrate the proposed typical conditions for Site Plan Review.

**VHB recommends that the Planning Board determine whether the current level of roadway cross-section detail is sufficient, to clearly identify the applicable section for each roadway segment and parking condition.**

5. The submitted plans and project narrative reference proposed walking trails, including mention of use by residents and the general public, as well as associated public parking. However, the plans do not clearly identify a typical trail detail, applicable design standards, surface materials, width, grading, drainage, or edge treatments. In addition, it is unclear whether the trails are intended to be publicly accessible or private amenities, how they will be maintained over time, and whether any portions are intended to meet accessibility standards. Coordination with the Conservation Commission, where trails are located near regulated resource areas, is also not clearly documented.

Without defined trail design standards, ownership, maintenance, and accessibility clarification, the Planning Board cannot determine whether the proposed trail system meets applicable regulatory requirements or ensure that it will function safely and be sustainably maintained over time.

VHB recommends that the Planning Board require the Applicant to provide additional documentation regarding the proposed trail system, including a typical trail detail and applicable design standards; clarification of intended use (public vs. private); identification of long-term ownership and maintenance responsibilities; confirmation of consistency with Conservation Commission requirements, where applicable; and clarification of whether any portions of the trail system are intended to comply with ADA and 521 CMR accessibility standards.

*MEI Response: The modified trail location on the revised plans is a result of input from the first Conservation Commission meeting. The final layout is currently in the process of review and coordination with the Amesbury Planning Staff and Conservation Commission. A trail detail has been added to the project drawings on Sheet 10.1.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that the trail layout has been revised based on Conservation Commission input and that a trail detail has been added to Sheet C-10.1.

This comment is partially addressed. VHB recommends that the Planning Board require the Applicant to continue coordination with Planning Staff and the Conservation Commission on the final trail layout and clarify the intended use of the trail system, including whether it will be public or private, long-term ownership and maintenance responsibilities, and whether any portions are intended to comply with ADA/521 CMR accessibility standards.

*MEI Response: The Applicant has been working with the Planning Staff on the details of the trail layout which are reflected on the updated plan. Details are now provided for each trail type. The trails will be owned and maintained by the North and South property owners with public access allowed. No portion of the trails are intended to be ADA accessible.*

**VHB Response:** The Applicant's response is noted. The revised plans provide details for the proposed trail types and clarify that the trails will be privately owned and maintained by the respective North and South Neighborhood property owners, with public access permitted. The Applicant has also stated that no portion of the trail system is intended to be ADA accessible. The ownership, maintenance, public-access, and trail-detail portions of the comment are considered addressed.

**VHB recommends that the Planning Board determine whether the proposed privately owned but publicly accessible trail system is subject to applicable ADA and 521 CMR accessibility requirements and whether an accessible trail segment or connection is required. Any final trail layout should also remain consistent with the requirements of the Conservation Commission and final Order of Conditions.**

6. The plans depict a secondary emergency access route connecting to Elm Street through the adjacent Animal Shelter property, and reference existing Access Easements and Emergency Egress Easements across that parcel. However, the submitted materials do not clearly document the legal status, scope, and applicability of these easements as they relate to the proposed development. It is unclear whether the existing easements legally permit use by this project for emergency access purposes, whether any additional rights or amendments are required, and who will be responsible for maintenance of the emergency access route from Elm Street through the Animal Shelter site to the project property.

Without documentation confirming the legal authority and maintenance responsibility for the secondary emergency access route, the Planning Board cannot ensure that reliable and enforceable emergency access will be available for the life of the project, which is fundamental to public safety and site plan approval.

VHB recommends that the Planning Board require the Applicant to provide documentation confirming the legal authority to utilize the referenced Access Easements and Emergency Egress Easements for this project, including copies of recorded easement documents and a description of their applicability. The Applicant should also clarify long-term maintenance responsibilities for the emergency access route and confirm coordination with the property owner and the Fire Department regarding design standards, surface treatment, and operational access.

*MEI Response: Per Response #53, agreements are in place for the emergency access easement. Long-term responsibility for maintenance of the emergency access will reside with the homeowners association of the South Neighborhood. Maintenance is expected to be de minimis, as the access will be limited to use in emergencies.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges the Applicant's statement that agreements are in place for the emergency access easement and that long-term maintenance responsibility will reside with the South Neighborhood homeowners association.

This comment is partially addressed. VHB recommends that the Planning Board require the Applicant to provide the referenced easement agreements, or identify where they have been submitted, and confirm that the easement rights expressly allow emergency access for the proposed development.

VHB further recommends that the Applicant document the HOA's long-term maintenance responsibility, including reporting as requested by The Planning Board and confirm acceptance of the emergency access route by the Amesbury Fire Department, including any requirements related to design standards, surface treatment, gate/access control, and operational access.

*MEI Response: A recorded easement for emergency access serving the proposed development is in place with the Amesbury Animal Hospital, and the proposed plans conform with that easement. Additionally, there is an agreement in place with the owner of 283 Elm St to provide an easement through its property once the project is approved.*

**VHB Response:** The Applicant's response is noted. The Applicant has clarified that a recorded emergency-access easement is in place across the Amesbury Animal Hospital property and that the proposed plans conform to that easement. However, the easement across 283 Elm Street has not yet been granted and remains subject to a future agreement following project approval. In addition, the South Neighborhood HOA's long-term maintenance responsibility for the full emergency-access route should be established in the applicable project documents. This comment remains partially outstanding.

**VHB recommends that the Applicant provide the recorded Amesbury Animal Hospital easement for confirmation of its applicability to the proposed development and obtain and record the required emergency-access easement across 283 Elm Street before commencement of construction dependent on that access. The HOA documents should also establish responsibility for inspection, maintenance, repair, snow removal, and continued operability of the emergency-access route.**

7. The project is located in close proximity to Interstate 495, and several residential buildings appear to be sited near the highway corridor. The submitted materials do not indicate whether a noise impact assessment has

been performed to evaluate potential roadway noise exposure to the proposed dwelling units, nor do the plans identify whether any sound attenuation measures (e.g., sound barrier walls, enhanced building envelope construction, berming, or landscaping buffers) are proposed.

Given the proximity to a major highway, it is unclear whether projected exterior and interior noise levels have been evaluated relative to applicable MassDEP noise guidance or industry-accepted residential standards. Without such analysis, the Planning Board cannot determine whether the proposed residential layout adequately addresses potential long-term noise impacts on future occupants.

VHB recommends that the Planning Board require the Applicant to clarify whether a traffic noise study has been conducted for the site. If not, it is suggested the Board should consider to require the Applicant to evaluate projected roadway noise levels and identify whether sound mitigation measures, such as sound barriers, berms, or enhanced building construction assemblies, are necessary to ensure acceptable residential living conditions.

*MEI Response: The Applicant has discussed sound attenuation of I-495 noise with an acoustical engineer. It is impractical to attenuate sound with walls or other structures, as the residential buildings along this edge are three- and four-story, and a sound barrier would need to be of similar height to provide meaningful noise reduction to occupants on upper floors.*

*The acoustical engineer has advised that the better alternative is to provide relief within the residential buildings. Massachusetts Stretch Code requires buildings to be well-insulated and airtight, which will provide sound attenuation. Importantly, there are no standards or regulations that apply to mitigation of ambient noise. The MassDEP noise guidance referred to by the peer reviewer is intended to govern generators of noise, such as industrial uses, not properties that are impacted by ambient noise, such as the case with Rocky Hill.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges the Applicant's clarification that sound attenuation has been discussed with an acoustical engineer, that exterior sound walls or similar structures are not considered practical due to the height of the residential buildings, and that the Applicant intends to rely on building envelope performance for interior sound attenuation.

This comment is partially addressed. VHB recommends that the Planning Board require the Applicant to provide documentation from the acoustical engineer summarizing the basis for the noise mitigation approach, including any assumptions regarding building envelope performance and whether additional interior noise attenuation measures are recommended for dwelling units closest to I-495.

VHB also recommends that the Applicant clarify whether any outdoor amenity areas or residential open space areas near I-495 are anticipated to experience elevated roadway noise and whether any site-planning or disclosure measures are proposed.

*MEI Response: Building Envelope and Sound Attenuation letter from Charles de Jager, PE is attached. This letter showcases substantial sound attenuation design and construction measures taken in detail.*

**VHB Response:** The Applicant's response is noted. The submitted Building Envelope and Sound Attenuation letter documents the proposed building-envelope measures and explains how the wooded buffer, landscaped setback, and building arrangement provide additional site-level noise attenuation from I-495. Based on the professional opinion provided, this comment is considered addressed.

8. The submitted plans indicate that waste management in the North Neighborhood is generally accommodated through grouped dumpster locations; however, the materials do not clearly identify how solid waste and recycling will be managed in the South Neighborhood or within the proposed civic/common-use areas. The plans do not clearly depict designated dumpster or trash enclosure locations for these areas, nor do they demonstrate how waste collection vehicles will access, maneuver within, and exit the site.

In addition, the submission does not include turning movement analysis for waste management vehicles to confirm that adequate access, backing distances, vertical clearances, and maneuvering radii are provided consistent with industry standards and municipal requirements.

Without this information, the Planning Board cannot determine whether waste collection can be safely and effectively accommodated without conflict with parked vehicles, pedestrian areas, emergency access routes, or internal circulation.

VHB recommends that the Planning Board require the Applicant to:

- Clearly identify all proposed waste and recycling collection locations for each neighborhood and civic/common-use area;
- Clarify whether collection will occur via private hauler or municipal service;
- Provide turning movement analysis for the largest anticipated waste collection vehicle demonstrating safe access and maneuverability; and
- Revise the site layout as necessary to ensure that waste collection operations do not conflict with parking, pedestrian circulation, or emergency access.

*MEI Response: All trash and recycling enclosures in the North Neighborhood are shown on the Site Layout Plans, Sheets 5.2 and 5.3. A straight approach is provided to each enclosure, with no parking spaces restricting access. Turning movement exhibits have also been included on new plans, Sheets 11.0–11.3, as the Amesbury ladder fire apparatus, which is larger and has more restrictive turning requirements.*

*In the South Neighborhood, trash and recycling bins will be stored within individual garages, as is typical for this type of housing.*

**(05/13/26) VHB Response:** The Applicant's response is noted. VHB acknowledges that trash and recycling enclosures for the North Neighborhood are shown on Sheets C-5.2 and C-5.3, and that turning movement exhibits have been added on Sheets C-11.0 through C-11.3 using the Amesbury ladder fire apparatus. VHB also acknowledges the Applicant's clarification that trash and recycling bins for the South Neighborhood will be stored within individual garages.

This comment is partially addressed. VHB recommends that the Planning Board require the Applicant to confirm whether waste and recycling collection will be provided by a private hauler or municipal service, and that the proposed collection approach is acceptable to the applicable service provider.

VHB recommends that the Applicant delineate anticipated trash pickup locations on the plans or a supplemental figure to demonstrate that collection activities will not block roadway access, emergency access, parking areas, or pedestrian routes.

VHB also recommends that the Applicant confirm how collection will occur for the South Neighborhood and civic/common-use areas, including whether curbside pickup is proposed and whether collection operations will conflict with on-street parking, pedestrian circulation, or emergency access.

*MEI Response: Both North and South Neighborhoods will be serviced by private haulers only. In the South Neighborhood, the bins will be stored in garages and rolled to the curb for pickup. In the North Neighborhood, dumpsters are provided for trash and recycling.*

**VHB Response:** The Applicant's response is noted. The Applicant has clarified that both neighborhoods will be served by private haulers, with dumpsters used in the North Neighborhood and individual bins rolled to the curb for collection in the South Neighborhood. The operational approach is generally understood; however, the submitted turning exhibits are based on the Amesbury ladder apparatus and do not specifically demonstrate access and maneuvering for the anticipated refuse collection vehicle.

**VHB recommends that the Planning Board determine whether the proposed waste collection approach is acceptable. If additional confirmation is required, the Applicant should provide turning movements for the largest anticipated private refuse vehicle, particularly at the North Neighborhood dumpster locations and any constrained South Neighborhood collection areas, or obtain written confirmation from the selected hauler that the proposed layout can be serviced without obstructing circulation, parking, pedestrian routes, or emergency access.**

#### *Additional Comment(s) May 13, 2026*

9. The submitted grading plans provide general contours, spot grades, and roadway profiles; however, detailed fine grading and pedestrian transition information is limited at building entrances, driveway/garage transitions, accessible routes, pedestrian crossings, parking areas, and localized low points. In addition, the plans show detectable warning panels at several pedestrian crossings; however, the ramp or transition type is not consistently identified. Some locations include directional arrows, while others show detectable warning panels without clear indication of whether the condition is a curb ramp, blended transition, raised crossing, or flush transition. VHB also notes that some proposed ramps/elevated walks appear to be located near catch basins, and it is unclear whether ramp grades, landings, inlet placement, and gutter flow paths can be constructed without accessibility or drainage conflicts.

As a result, VHB cannot fully verify ADA/521 CMR compliance, positive drainage away from buildings, driveway and walkway transitions, inlet functionality, or whether localized ponding may occur in pedestrian, parking, driveway, or building entry areas.

VHB acknowledges that some fine grading is typically refined during later design phases. However, VHB recommends that the Planning Board require the Applicant to provide additional spot grades, ramp/transition callouts, and fine grading information in critical areas sufficient to demonstrate that accessible routes, building access points, parking areas, driveways, pedestrian crossings, sidewalk connections, ramps/elevated walks, and drainage structures can be constructed without accessibility, drainage, or constructability conflicts.

*MEI Response: Spot grades have been added throughout drawings for establishing garage and first floor grades in the South Neighborhood and confirming drainage flow in rear common driveways. Overall, the project grades are very slight which does not present issues at curb ramps and sidewalks.*

**VHB Response:** The Applicant's response is noted. The revised plans include additional spot grades for garage and first-floor elevations and rear common driveways within the South Neighborhood. Based on the supplemental grading information and the Applicant's representation that the proposed grades are sufficiently mild to accommodate compliant pedestrian and drainage transitions, this comment is considered addressed.

Final construction documents should continue to provide the detailed grading and transition information necessary to demonstrate compliance with applicable accessibility and drainage requirements.

10. The grading plans appear to show a potential conflict between proposed parking spaces and grades in the area between Infiltration Areas 1A and 1B. It is unclear whether the proposed grading can be achieved while maintaining functional parking slopes, curb reveal, access, pedestrian transitions, and positive drainage.

VHB recommends that the Planning Board require the Applicant to provide additional spot grades or revised grading in this area to demonstrate that the parking layout and drainage design can be constructed as shown without creating excessive slopes, ponding, or accessibility/operational conflicts.

*MEI Response: Overall, the project grades in the parking lots are very slight, less than 2% which does not present issues at curb ramps and sidewalks.*

**VHB Response:** The Applicant's response is noted. The Applicant has clarified that the parking-area grades between Infiltration Areas 1A and 1B are less than two percent and are not anticipated to create conflicts with parking operations, curb reveals, pedestrian transitions, or drainage. Based on this clarification, this comment is considered addressed.

Final construction documents should include sufficient spot grading to confirm positive drainage and constructible parking and pedestrian transitions in this area.

11. The submitted plans do not clearly identify anticipated locations for major electrical equipment, including transformers, pad-mounted utility equipment, generators, switchgear, or other service infrastructure that may be required to serve the proposed buildings and common facilities. VHB acknowledges that final equipment locations may be coordinated with the utility provider during later design phases; however, the current layout should demonstrate that adequate space has been considered for this infrastructure.

Without this clarification, the Planning Board cannot determine whether future utility equipment may conflict with parking, sidewalks, landscaping, snow storage, drainage facilities, building access routes, or emergency access.

VHB recommends that the Planning Board require the Applicant to confirm that electrical service equipment locations have been considered and that adequate space can be accommodated within the proposed layout. As the design advances, the Applicant should coordinate with the electric utility and identify equipment locations, clearances, access requirements, screening, and maintenance areas on the plans.

*MEI Response: As with every project of this nature, the utility companies dictate design and locations of utility infrastructure based upon the utility provider's own design which the Applicant must follow. This design work typically occurs at the beginning of the site construction process, and thus, it is impractical for the Applicant to provide locations at this time.*

**VHB Response:** The Applicant's response is noted. VHB acknowledges that final electrical infrastructure design and equipment locations will be determined by the applicable utility providers during later design phases. However, the current submission does not identify conceptual locations for major electrical equipment or otherwise demonstrate that adequate space has been reserved for transformers, generators, switchgear, and related infrastructure. This comment remains partially outstanding.

**VHB recommends that the Applicant identify conceptual equipment locations or reserved utility areas on the plans sufficient to demonstrate that the required infrastructure can be accommodated without conflicts with parking, sidewalks, accessible routes, landscaping, snow storage, drainage facilities, building access, or emergency circulation. Final equipment locations and details may be refined through coordination with the utility providers.**

12. The submitted utility plans depict the general horizontal layout of proposed sewer, drain, water, electric, and telecommunications infrastructure; however, the utility profiles primarily show sewer and drainage information and do not appear to include water, electric, or telecommunications crossings. VHB also notes several minor potential utility coordination conflicts based on the plan layout.

VHB acknowledges that final utility coordination is commonly refined during construction document preparation and utility provider coordination. However, the Applicant should confirm that adequate horizontal and vertical separation can be maintained between proposed utilities and that the utility layout can be constructed without conflicts.

VHB recommends that the Planning Board require the Applicant to confirm that water, electric, telecommunications, sewer, and drainage crossings have been reviewed for constructability and separation requirements. Any required utility adjustments should be incorporated into the construction documents prior to construction.

*MEI Response: The Applicant is willing to accept a condition of approval which requires the Applicant confirm that water, electric, telecommunications, sewer, and drainage crossings have been reviewed for constructability and separation requirements. These separations are always required and dictated by the utility providers.*

**VHB Response:** The Applicant's response is noted. The Applicant has agreed that proposed utility crossings will be reviewed for constructability and required horizontal and vertical separation prior to construction. This comment is separate from the preceding request for conceptual locations of major electrical equipment and is limited to coordination among the proposed utility systems. This comment is considered addressed subject to inclusion of an appropriate condition.

**VHB recommends that any approval require the Applicant to confirm, prior to construction, that all water, sewer, drainage, electric, and telecommunications crossings have been reviewed for constructability and applicable separation requirements, with any necessary revisions incorporated into the final construction documents.**

13. The erosion and sedimentation control plans appear to require further coordination with the proposed grading, drainage, wetland resource areas, and limits of work. VHB notes several areas where perimeter controls and inlet protection may need to be adjusted, including near the isolated wetland by Buildings 1 and 2, Infiltration Basin 1, the Building 2 parking area, and select proposed drainage structures.

VHB recommends that the Planning Board require the Applicant to review and revise the erosion and sedimentation control plans, as necessary, to ensure that perimeter controls, inlet protection, and stormwater BMP protection measures are appropriately located and coordinated with the final grading and drainage design.

***MEI Response:** The erosion control plans have been updated with specific conditions required within the infiltration BMPs;*

**VHB Response:** The Applicant's response is noted. The revised erosion-control plans include additional requirements and protection measures for work within the proposed infiltration BMP areas. Based on the revised plans and information provided, this comment is considered addressed.

14. The grading plans appear to show proposed grading extending onto adjacent property along a portion of Road A / Central Boulevard. Based on the information provided, it is unclear whether it is necessary to construct the proposed roadway, and whether the Applicant has secured or is pursuing the required grading rights or easements from the affected property owner.

VHB recommends that the Planning Board require the Applicant to clarify whether any proposed grading, slope work, drainage, or construction activity is located outside the project property limits. If off-site grading is necessary to construct the proposed roadway or site improvements, the Applicant should provide documentation of temporary and/or permanent rights prior to approval or revise the plans to eliminate work outside the project limits.

***MEI Response:** There will be no off-site grading other than emergency access and review of the same will be a part of a separate site plan application.*

**VHB Response:** The Applicant's response is noted. The Applicant has clarified that no off-site grading is proposed along Road A / Central Boulevard and that any work associated with the emergency access will be addressed under a separate Site Plan application. Based on this clarification, this comment is considered addressed.

15. The submitted plans/details do not clearly identify the minimum and maximum proposed building driveway slopes or the design criteria used for driveway grading. Based on the information provided, VHB cannot verify whether driveway grades, garage transitions, sidewalk crossings, and drainage patterns will function properly without creating vehicle clearance, ponding, or accessibility conflicts.

VHB recommends that the Planning Board require the Applicant to identify the proposed minimum and maximum building driveway slopes and provide additional spot grades or additional information on the typical driveway grading details demonstrating that driveway transitions, garage entries, sidewalk crossings, and drainage patterns can be constructed safely and functionally.

***MEI Response:** Spot grades have been added throughout drawings for establishing garage and first floor grades in the South Neighborhood and confirming drainage flow in rear common driveways.*

**VHB Response:** The Applicant's response is noted. The revised plans include additional garage, first-floor, and rear-driveway spot grades within the South Neighborhood, providing further information regarding the proposed driveway transitions and drainage patterns. Based on the supplemental grading information, this comment is considered addressed.

Final construction documents should include sufficient grading information to confirm functional garage transitions, positive drainage, and applicable accessibility requirements.

16. The submitted plans appear to show limited or unclear sidewalk connections to Buildings 4 through 8 in the South Neighborhood. Based on the information provided, it is unclear whether these buildings are connected to the internal pedestrian network by a continuous sidewalk or accessible route.

VHB recommends that the Planning Board require the Applicant to clarify pedestrian access to Buildings 4 through 8 and revise the plans, as necessary, to provide continuous sidewalk connections or otherwise demonstrate how safe and accessible pedestrian access will be provided between these buildings, parking areas, internal roadways, and common open space areas.

*MEI Response:* This cluster of five homes is served by what amounts to a loop drive with a landscaped median internal to the loop. Notably, only three of the five homes have driveway access on the loop. The landscaped median includes a walkway providing direct access to the internal walkways serving the balance of the community. The applicant believes this walkway provides sufficient safe access given the very light automobile use of the loop drive.

**VHB Response:** The Applicant's response is noted. The Applicant has clarified that the landscaped median walkway connects the residential cluster to the broader pedestrian network and that the loop drive is expected to experience limited vehicular use. However, the proposed arrangement does not provide a continuous sidewalk connection to each of Buildings 4 through 8 and may require pedestrians to travel within or cross the shared drive.

**VHB recommends that the Planning Board determine whether the proposed pedestrian-access arrangement is sufficient for this residential cluster.**

17. As discussed with the Applicant on May 6, 2026, the Applicant has indicated that the Main Boulevard may be offered for future acceptance as a public roadway. The plans should clearly identify the limits of any roadway, sidewalk, drainage, utility, lighting, landscaping, or related infrastructure proposed for public ownership, City maintenance, or future acceptance.

The submission does not appear to clearly distinguish between infrastructure that will remain privately owned and maintained and infrastructure that may be conveyed to or maintained by the City. This distinction is necessary to confirm the applicable design and construction standards, inspection requirements, acceptance process, and long-term maintenance responsibilities. Utility ownership and maintenance should also be clarified, including water, sewer, drainage, stormwater BMPs, street lighting, hydrants, and private franchise utilities within or serving the Main Boulevard corridor.

VHB recommends that the Applicant revise the plans or provide a supplemental narrative identifying the proposed public/private ownership and maintenance limits. VHB further recommends that the Department of Public Works review any roadway or infrastructure proposed for public acceptance for conformance with applicable Amesbury public roadway standards, including pavement section, curbing, drainage, sidewalks, utilities, inspections, as-builts, and acceptance sequencing.

*MEI Response:* The Applicant is willing to accept a condition of RH-MFOD Site Plan Approval which requires the Applicant to obtain Definitive Subdivision Approval identifying the proposed public/private ownership and maintenance limits, along with roadway specifications to be reviewed by the Department of Public Works.

**VHB Response:** The Applicant's response is noted. The Applicant has agreed that the proposed public and private ownership and maintenance limits, together with the applicable roadway specifications, will be established through the Definitive Subdivision review process and reviewed by the Amesbury DPW. This comment is considered addressed subject to inclusion of an appropriate condition.

**VHB recommends that any Planning Board approval require Definitive Subdivision Approval identifying the limits and responsibilities for public and private roadways, sidewalks, drainage, utilities, lighting, landscaping, stormwater facilities, and related infrastructure, including DPW review of all improvements proposed for public acceptance.**