



MILLENNIUM ENGINEERING, INC.
Land Surveyors and Civil Engineers

June 29, 2026

Planning Board Chair
City of Amesbury
62 Friend St.
Amesbury, MA 02913

Attn; Chairman - Pascal Rettig

**Subject: Proposed Rocky Hill MBTA Community Development Elm Street, Amesbury, Ma
Site Plan and Civil Engineering Peer Review #2 5.13.26
MEI's Response to Comments**

Dear Pascal Rettig,

This memorandum provides our responses to the VHB peer review comments dated May 13, 2026, for the above-referenced project. The outstanding comments from the VHB May 13th review letter that require response are provided in the document with the applicants repossess provided in bold font. These comments represent the outstanding items from the May 13th review letter to be coordinated and resolved. Updated plans, stormwater calculations and supporting documents are included with this submission.

Missing Materials

› Site plan or exhibit identifying the Double Ring Infiltrometer testing locations

Provided as attachment with updated stormwater report submission

› PE-stamped infiltration testing report and supporting documentation

Provided as attachment with updated stormwater report submission

› Explicit drawdown time calculations for each infiltration BMP

Provided with updated stormwater report submission

› Site-wide Total Phosphorus removal calculation weighted by tributary impervious area

The project now provides 1" total water quality volume. This satisfies the Amesbury phosphorus removal requirements per Section 7.10.B.a.ii with no supporting calculations required.

› Pretreatment sizing documentation, including WQU sizing / sediment storage volume

Provided with updated stormwater report submission

› Documentation supporting constructed wetland flow path ratio and pond-scaping / planting design

No longer needed, all constructed wetlands removed from the project

› Final utility capacity confirmation from Amesbury DPW / applicable providers

Email from DPW Director provided attached to this response letter

› Consolidated waiver list with bylaw citations and justification

The applicant is working with Staff on the applicable waivers to be included in the final decision

› Legal documents identifying long-term ownership / maintenance responsibilities and easements

The applicant proposes any required legal documents to be coordinated with Staff and recorded prior to first certificate of occupancy.

› Written Fire Department confirmation

Letter from Amesbury Fire Department attached

› Any remaining proprietary BMP support documentation

Documentation attached to the updated stormwater report for the proposed pretreatment BMP's

› Accessible parking summary by parking facility / use

The required HC parking has been provided as shown and tabulated on the Site Layout plans, the spaces have been located near the accessible units and community areas.

› EV-ready / accessible EV summary and representative layout details

The EV- ready spaces are shown on the Site Layout plans. Accessible EV chargers are available adjacent to two residential buildings which will include accessible units – Buildings #7 and #18. EV chargers are pole-mounted at various parking spaces and sited so as not to interfere with landscaping or other utilities. Conduit will be provided where necessary to provide future service.

› Snow storage plan / figure with supporting calculations

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.

› Noise memo from acoustical engineer

Building Envelope and Sound Attenuation letter from Charles de Jager, PE is attached.

› Trail ownership / maintenance / accessibility clarification

The trail will be owned and maintained by the respective landowners of the North and South Neighborhoods. In the North that will ultimately be a single landlord/owner, and in the South the HOA.

› Typical emergency overflow detail

The emergency overflow detail has been added to the plan details

Conformance with the Zoning Ordinance

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

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

VHB Comment: 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.

Applicant's Response: A zoning table with open space calculations has been provided.

2. Section XI.V.7.4 Project Phasing

VHB Comment: 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.

Applicant's 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.

Section XI.Q.10.5 Development and Performance Standards

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

VHB Comment: 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.

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

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

VHB Comment: 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.

Applicant's 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.

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

1. 2.02

VHB Comment: 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.

Applicant's 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.

2. 6.04 Environmental and Community Impact Analysis

VHB Comment: 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.

Applicant's 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.

1. 7.09.H Pedestrian and Bicycle Paths.

VHB Comment: 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.

Applicant's 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.

2. 7.15 Earth Removal.

VHB Comment: 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.

Applicant's 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.

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

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

VHB Comment: 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.

Applicant Response: The proposed South Neighborhood parking supply is as follows:

- **GARAGE SPACES = 154.** Seventy-one homes will have a 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 for 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 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.**

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

VHB Comment: 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.

Applicant's 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.

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

VHB Comment: 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.

Applicant's 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.

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

VHB Comment: 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.

Applicant's 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.

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

VHB Comment: 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.

Applicant's Response: See Applicant's response above.

XI.Q.10.5.g. Erosion Control.

VHB Comment: 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.

Applicant's 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 NDPDES Construction Permit NOI and SWPPP to the Planning Department for review and approval prior to the commencement of construction.

5. XI.Q.10.5. j. Lighting.

VHB Comment: 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.

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.

6. XI.Q.10.5.m. Utilities.

VHB Comment: 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.

Applicant's Response: Correspondence from the DPW director is attached confirming water and sewer capacity. The only publicly owned utilities will be 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.

Section XI.Q.10.3 Materials for Review

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

VHB Comment: 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.

Applicant's Response: Correspondence from the DPW director is attached confirming water and sewer capacity. The only publicly owned utilities will be 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.

Section XI.Q.10.4 Additional Materials for Review

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

VHB Comment: 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.

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

Section VIII: Off-Street Parking And Loading Regulations

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

VHB Comment: 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.

Applicant's 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.

Section VIII: Off-Street Parking And Loading Regulations

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

VHB Comment: 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.

Applicant's Response: Vertical granite or sloped granite curbing is provided throughout the project area. As noted above the curb type at locations proposed exceed the requirements of this zoning Section.

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

VHB Comment: 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.

Applicant's Response: All roadways, drive aisles and stall dimensions are called out on the Site layout plans. Note, the dismissions 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.

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

VHB Comment: VHB recommends that the Applicant provides 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.

Applicant's 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.

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

VHB Comment: 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

Applicant's 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.

Stormwater Management Compliance

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

1. *7.10.B. Design Basis.*

VHB Comment: 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.

Applicant's 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,

2. *7.10.B.1 Design Basis.*

VHB Comment: 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.

Applicant's 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.

3. 7.10.B.3 Design Basis

VHB Comment: 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.

Applicant's 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.

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

VHB Response: 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.

Applicant's 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.

5. The Rawls infiltration rate

VHB Comment: 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.

Applicant's 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.

6. VHB Comment: 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.

Applicant's 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.

7. Surface Basin Details.

VHB Comment : Comments addressed except that basin freeboard should be reconfirmed if basin geometry, berm elevations, or stormwater routing are revised in response to other comments.

Applicant's Response: All top of berm elevations are provided with the updated design.

8. The Massachusetts Stormwater Handbook (Volume 2, Chapter 2 – Infiltration Practices)
VHB Comment: 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.

Applicant's Response: The applicant does not have any issue with this condition.

9. OCS-18

VHB Response: 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.

Applicant's 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.

10. Test Pits 19A and 19C

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

Applicant's Response: Test Pit 19 series is now corrected.

11. 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. **VHB Comment:** 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.

Applicant's 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.

15. The proposed constructed (pocket) wetlands

VHB Comment: 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.

Applicant's Response: All constructed wetlands have been removed from the plans.

16. The MassDEP Stormwater Checklist

VHB Comment: 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.

Applicant's 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.

17. SWPPP

VHB Comment: VHB recommends that the Planning Board requires 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.

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

18. VHB Comment; The Massachusetts Stormwater Handbook requires that infiltration systems fully dewater within 72 hours

VHB Comment: 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.

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

19. Pretreatment Sizing Documentation.

VHB comment: 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.

Applicant's Response: The requested information is now attached to the stormwater report.

Additional Comment(s) May 13, 2026

20. Use of NOAA Atlas 14 Precipitation Depths

VHB Comment: 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

Applicant's Response: The calculations are based upon the NOAA Atlas 14 numbers as published within the hydrocadd 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.

21. Emergency Overflow Detail

VHB Comment 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

Applicant's Response: The emergency overflow detail has been added to the plans.

22. Location of Catch Basin Corner Inlets.

VHB Response: 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.

Applicant's Response: The catch basins have been moved from curb corner inlet conditions.

23. Sizing of Outlet Orifices.

VHB Comment: 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.

Applicants 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.

General Engineering & Plan Comments

1. Fire Department Comments,

VHB Comment: 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.

Applicant's 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.

2. The proposed development includes multiple neighborhoods and shared infrastructure systems,

VHB Comment:: 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.

Applicant's 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.

3. Cross Sections for Internal Street.

VHB Comment: 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.

Applicant's 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.

4. Trail Layout.

VHB Comment: 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.

Applicant's 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.

5. Emergency Access

VHB Comment: 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.

Applicant's 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.

6. Sound Attenuation

VHB Comment: 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.

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.

7. Solid Waste Management

VHB Comment: 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.

Applicant's 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.

Additional Comment(s) May 13, 2026

8. Grading

VHB Comment: 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.

Applicant's 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.

9. Parking and Grading between Infiltration Areas 1A and 1B.

VHB Comment: 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.

Applicant's 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

10. Public Utility Locations

VHB Comment: 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.

Applicant's 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.

11. Final Utility Plans.

VHB Comment: 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.

Applicant's 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.

12. Coordination of Erosion and Sedimentation Controls near the isolated wetland by Buildings 1 and 2, Infiltration Basin 1, the Building 2 parking area, and select proposed drainage structures.

VHB Comment: 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.

Applicant's Response: The erosion control plans have been updated with specific conditions required within the infiltration BMPs;

13. Grading Extending Onto Adjacent Property Along Road A / Central Boulevard.

VHB Comment: 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.

Applicant's 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.

14. Identification of Minimum and Maximum Proposed Building Driveway Slopes or Design Criteria For Driveway Grading.

VHB Comment: 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.

Applicant's 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.

15. Clarification of Sidewalk Connections to Buildings 4 through 8 in South Neighborhood.

VHB Comment : 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.

Applicant 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.

16. Public Acceptance of Main Boulevard -- Clarification of Infrastructure To Be Publicly Accepted and Privately Owned.

VHB Comment 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.

Applicant's 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 will be providing a review letter under separate cover evaluating the functional transportation-related elements of the Site plan. This will supplement VHB's current technical Site plan review and VHB's prior review of the off-Site transportation aspects of the Project.

Applicant Response: The transportation elements of the project have been reviewed by the Amesbury Fire Chief confirming the site layout provides adequate emergency

circulation and access. The overall road layout and specifications comply with the letter and intent of the Rocky Hill Neighborhood Pattern Book.

This concludes our response to the May 15th VHB peer review comments. Please see the attached information referenced in the response to comments above. As noted in responses above the attached information includes the following items;

1. Email from Amesbury DPW Director
2. Letter from Amesbury Fire Chief
3. Sound Attenuation letter
4. Parking Summary Figure
5. Snow Storage Figure
6. In response to Planning Board's request for information, we have included a proposed affordable unit matrix showing distribution of affordable units in each neighborhood.

We look forward to meeting with the Planning Board to review the changes provided in greater detail. In the meantime, if you have any questions regarding this project, please feel free to contact me at 978-463-8980.

Sincerely,

Millennium Engineering, Inc.

A handwritten signature in cursive script that reads "Stephen Sawyer".

Stephen Sawyer, P.E.
Project Manager

From: [Stephen Sawyer, P.E.](#)
To: [Bob Dale](#); [Brendan Dale](#)
Subject: FW: Rocky Hill
Date: Wednesday, May 6, 2026 10:54:57 AM
Attachments: [image001.png](#)
[image002.png](#)

From: Joseph Buckley <buckleyj@amesburyma.gov>
Sent: Wednesday, April 29, 2026 3:39 PM
To: Stephen Sawyer, P.E. <SSawyer@mei-ma.com>
Cc: Nipun Jain <NIPUN@amesburyma.gov>; Brian LeBlanc <leblancb@amesburyma.gov>; Tom Rogers <rogerst@amesburyma.gov>
Subject: RE: Rocky Hill

Stephen,

Based on the estimate in the ENF there is adequate capacity in our system to support the planned development. As the project continues to work its way through the approval process and you get closer to a final design, we will want to see a more accurate estimate based on the that final set of plans.

Thanks
Joe

Joseph Buckley P.E.
Director of Amesbury Public Works
(978)388-6652
City Hall | 62 Friend Street | Amesbury, MA 01913
www.amesburyma.gov



Notice: Please be aware the Massachusetts Secretary of State has determined that most emails to and from the City of Amesbury are public records and therefore cannot be kept confidential.

[MGL: Chpt.66, Sec.10 Public Records Law.](#)

From: Stephen Sawyer, P.E. <SSawyer@mei-ma.com>

Sent: Monday, April 27, 2026 8:30 AM

To: Joseph Buckley <buckleyj@amesburyma.gov>

Cc: Nipun Jain <NIPUN@amesburyma.gov>; Brian LeBlanc <leblancb@amesburyma.gov>; Tom Rogers <rogerst@amesburyma.gov>

Subject: RE: Rocky Hill

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you have confirmed that the content is safe.

Hi Joe,

Based on your first response it sounded like we are all set with capacity. A quick email confirming we capacity for the 0.04 MGD generated by the project would be very helpful.

Thanks

Steve S

From: Stephen Sawyer, P.E.

Sent: Tuesday, April 21, 2026 5:52 PM

To: Joseph Buckley <buckleyj@amesburyma.gov>

Cc: Nipun Jain <NIPUN@amesburyma.gov>; Brian LeBlanc <leblancb@amesburyma.gov>; Tom Rogers <rogerst@amesburyma.gov>

Subject: RE: Rocky Hill

Hi Joe,

Think all previous correspondence was with Lisa, here is the daily flow numbers from the EIR,

“The 80,630 GPD flow noted to be generated in the ENF was based upon the 310 CMR 15,203 which is 200% of the actual flow. The actual additional flow that the Amesbury Water Pollution Abatement Facility (WPAF) will need to accommodate is approximately 40,315 gpd or 0.04MGD”

Let me know if you need more detailed information .

Thanks,

Steve S.



MEMORANDUM

To: Amesbury Planning Board

From: Chief Robert Serino

CC:

Date: 27 April 2026

RE: Elm Street – Rocky Hill MBTA Community

Members of the Planning Board,

I am writing on behalf of the Fire Department to acknowledge and thank the developer for their continued coordination and responsiveness throughout the review process for the proposed project. We appreciate the efforts made to address fire protection concerns, specifically the addition and spacing of hydrants along Road B within the north neighborhood. Based on our review of the current plans, including the updated hydrant layout, the Fire Department is in tentative agreement with the proposed design as it is presently configured. As the Authority Having Jurisdiction, the Fire Department finds that the plans, as submitted, are generally consistent with the applicable requirements of the Massachusetts Fire Code. Accordingly, we have no objection to the project moving forward at this stage of the process.

Please note that this concurrence is based on the plans as currently presented. The Fire Department will continue to work collaboratively with the developer during subsequent phases of design and construction to ensure that all fire protection systems, access, and water supply components remain compliant and are optimized for operational effectiveness.

We appreciate the opportunity to be involved in this process and look forward to continued coordination as the project advances.

Respectfully,

Chief Robert JH Serino

Amesbury Fire Rescue • 124 Elm Street • Amesbury, MA 01913
P (978) 388-8185 • serinor@amesburyma.gov

MAKE HISTORY HERE

June 4, 2026

Dale Development

Attn: Project Team

Re: Building Envelope and Sound Attenuation, Rocky Hill at Amesbury (North and South Neighborhoods), 283 Elm Street, Amesbury, MA

To the Dale Development Project Team:

At your request, and in support of your site plan review submission to the Amesbury Planning Board, this letter summarizes how the building envelope for Rocky Hill at Amesbury, as currently designed, will reduce traffic noise from Interstate 495 (the Blue Star Memorial Highway) for future residents. Energy Credit Consulting (ECC) serves as the energy code and building envelope consultant for the project.

Scope of This Opinion

ECC provides energy and building science consulting and RESNET HERS rating services. It is our professional opinion, grounded in established building science, that the envelope being constructed for this project reflects sound and recognized practices that will meaningfully reduce highway noise for residents.

Site and Highway Context

The development is organized into a North Neighborhood and a South Neighborhood. Interstate 495 (the Blue Star Memorial Highway) runs along the northern edge of the property, and the buildings of the North Neighborhood that front this edge are the closest to the highway and therefore the most acoustically exposed. These highway facing buildings are the primary focus of this letter. Between them and the I-495 travel lanes lies an existing wooded buffer together with a landscaped setback, which provide a first layer of natural noise attenuation. The site layout also positions these larger multifamily buildings as a nearly continuous built frontage along the highway, so they shield the lower density South Neighborhood and the interior of the community from direct line of sight to I-495, which is itself a recognized site level approach to noise mitigation. Interstate 95 lies farther to the east, separated from the site by a wide wooded buffer, and is not the governing noise exposure for the residences. The most exposed surfaces, the I-495 facing walls of the North Neighborhood buildings, receive the full envelope package described below.

How Exterior Noise Reaches Interior Spaces

Traffic noise reaches interior living spaces through three principal paths: transmission through the opaque walls and roof, transmission through windows and doors, and leakage through gaps and penetrations in the building shell. Windows and air leakage paths are typically the weakest links, because even a small unsealed gap or a thin glazing unit can undermine an otherwise heavy wall. Highway noise is also dominated by lower frequency energy from tires and engines, which is best resisted by assemblies that combine mass, continuity, and air tightness. The envelope for this project addresses all three paths, as summarized below.

As-Designed Envelope Measures and Their Acoustic Benefit

Measure	As Designed	Why It Reduces Highway Noise
Exterior cladding	James Hardie fiber cement siding	Fiber cement is a dense, heavy cladding. Added mass is the primary driver of sound transmission loss through a wall, and fiber cement substantially outperforms lightweight claddings such as vinyl.
Continuous insulation	R-10 polyiso (1.5 in.) on furring over Zip-R structural sheathing	The continuous insulation layer and the structural sheathing add material outboard of the framing. The added layers and the furring cavity contribute mass and help interrupt direct sound paths through the wall.
Wall cavity	2x6 framing fully filled with R-21 fiberglass batt	A fully filled cavity damps resonance inside the wall and absorbs sound energy, improving transmission loss relative to an empty or partially filled cavity.
Interior finish	5/8 in. gypsum board	The heavier 5/8 in. board, rather than 1/2 in., adds interior mass to the assembly and further increases transmission loss.
Windows	Insulated double pane, fiberglass frame, U-0.27	Insulated double pane units in well sealed fiberglass frames perform substantially better than baseline single pane or builder grade windows. Because windows are the weakest acoustic link, this is the most important element on the highway facing facades. See the enhancement options below.
Roof and attic	R-60 blown cellulose over 5/8 in. gypsum ceiling	Densely applied cellulose is an effective sound absorber, and the deep insulation layer over a gypsum ceiling provides both mass and absorption against noise from above.
Air sealing	Continuous air barrier, tested to 0.30 CFM50 per square foot of shell or tighter	Sealing gaps and penetrations closes the leakage paths that most undermine acoustic performance. The target is verified by blower door testing at completion, so the result is measured rather than assumed.
Ventilation	Balanced energy recovery ventilator (ERV) providing continuous fresh air	Because each unit receives mechanical fresh air, residents do not need to open windows to ventilate. This allows the acoustic envelope to remain intact year round, which is essential to its effectiveness near a highway.

Enhancement Options

The windows specified for the current design are high quality double pane units selected to meet energy code. If additional sound attenuation is desired on specific I-495 facing facades, the single most effective enhancement is to upgrade those windows to triple pane or to laminated acoustic glazing, which uses a sound dampening interlayer between the panes. The wall, roof, and air sealing assemblies described above already accommodate this upgrade with no change, so it can be applied selectively where it provides the greatest benefit.

Professional Opinion

Taken together, the measures above represent sound and recognized building envelope practices for reducing the intrusion of exterior traffic noise. Combined with the wooded buffer, the landscaped setback, and the

shielding provided by the site layout, it is our professional opinion that highway noise has been appropriately considered in the design of this project and is not expected to present a problem for future residents. The envelope provides an interior acoustic environment well suited to residential use, with a clear path to further enhancement on the most exposed I-495 facing facades if desired.

Sincerely,

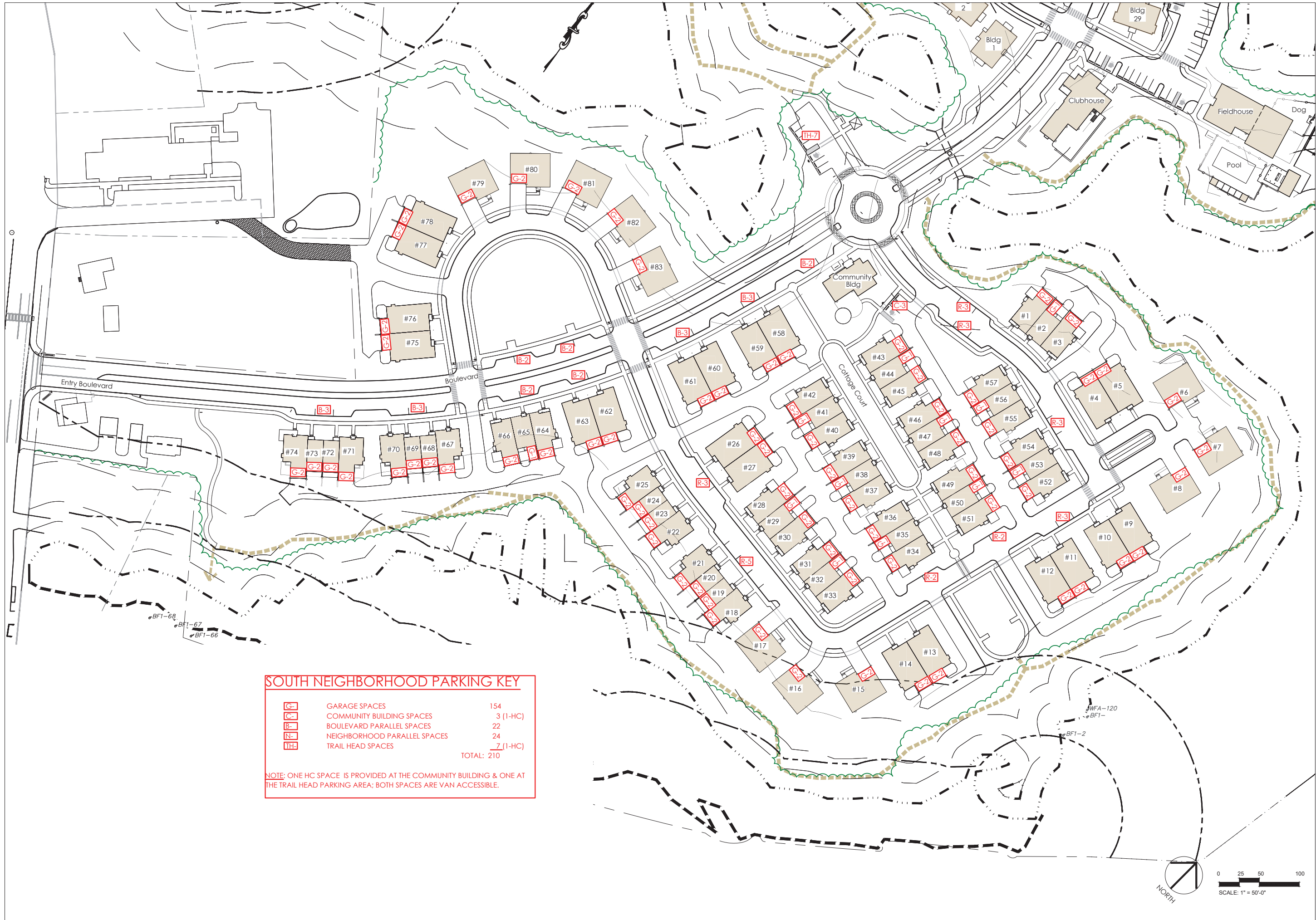
Charles Dejager

Principal Engineer, Energy Credit Consulting

RESNET HERS Rater, RTIN 6221525

charles@energycreditconsulting.com

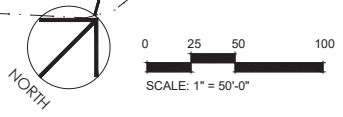
This letter reflects the professional judgment of Energy Credit Consulting as energy and building envelope consultants and RESNET HERS Raters. It is not a stamped acoustical engineering report and does not certify compliance with any specific interior sound level or municipal noise standard.



SOUTH NEIGHBORHOOD PARKING KEY

	GARAGE SPACES	154
	COMMUNITY BUILDING SPACES	3 (I-HC)
	BOULEVARD PARALLEL SPACES	22
	NEIGHBORHOOD PARALLEL SPACES	24
	TRAIL HEAD SPACES	7 (I-HC)
		TOTAL: 210

NOTE: ONE HC SPACE IS PROVIDED AT THE COMMUNITY BUILDING & ONE AT THE TRAIL HEAD PARKING AREA; BOTH SPACES ARE VAN ACCESSIBLE.



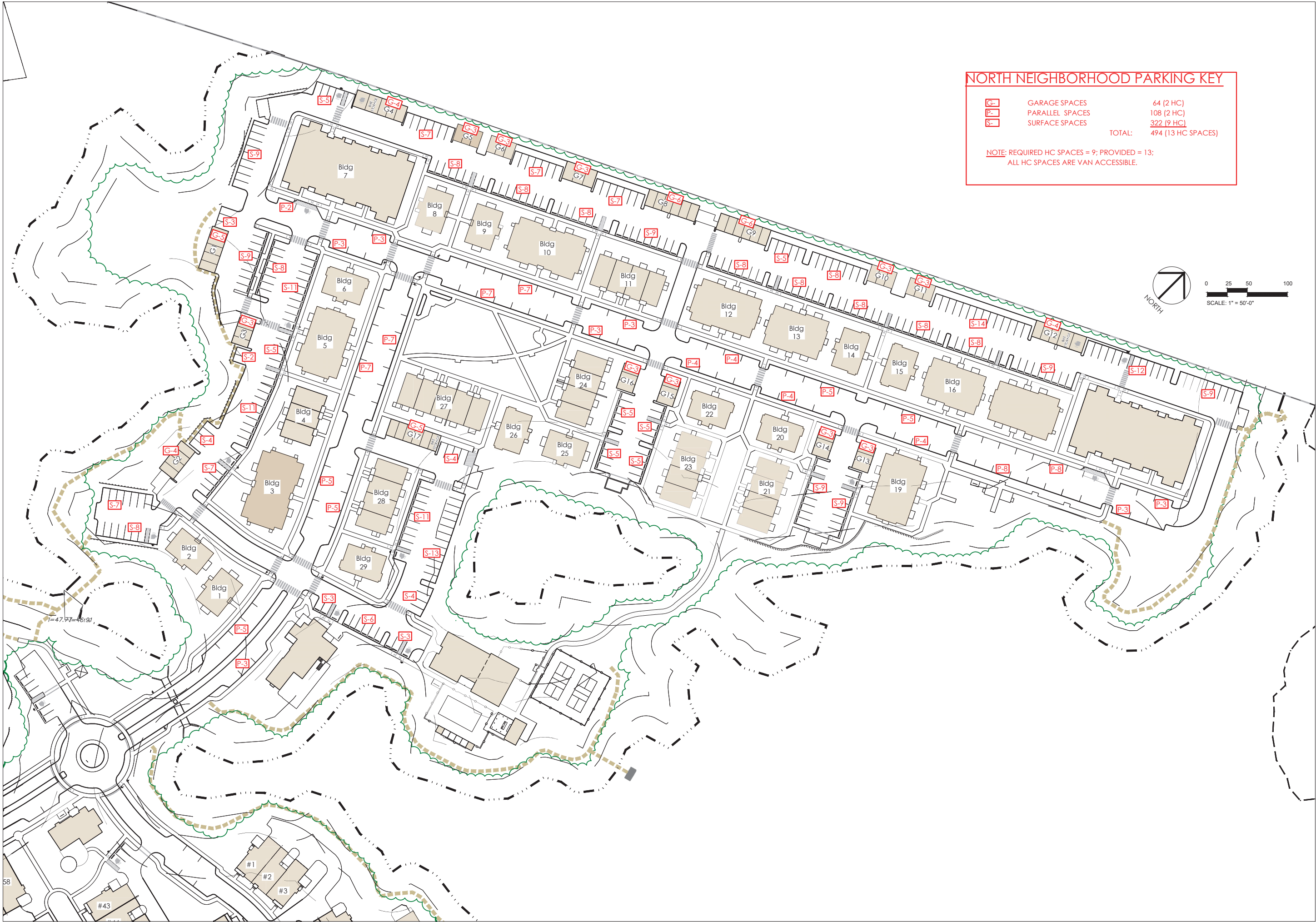
ISSUED		06/29/26	Plan Set Updates & Peer Responses
1			
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4			
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RYAN ASSOCIATES
LANDSCAPE ARCHITECTURE AND PLANNING
144 Moody Street, Building 4
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**Rocky Hill
Amesbury, MA**

**SOUTH NEIGHBORHOOD
-- PARKING PLAN --**

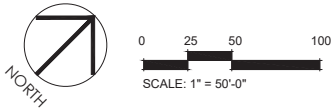
PP-1



NORTH NEIGHBORHOOD PARKING KEY

G	GARAGE SPACES	64 (2 HC)
P	PARALLEL SPACES	108 (2 HC)
S	SURFACE SPACES	322 (9 HC)
TOTAL:		494 (13 HC SPACES)

NOTE: REQUIRED HC SPACES = 9; PROVIDED = 13;
ALL HC SPACES ARE VAN ACCESSIBLE.



ISSUED

1	06/29/26	Plan Set Updates & Peer Responses
2		
3		
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7		

ASSOCIATES

LANDSCAPE ARCHITECTURE AND PLANNING

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RYAN

Rocky Hill
Amesbury, MA

NORTH NEIGHBORHOOD

-- PARKING PLAN --

SP-2

Rocky Hill MBTA Afforable Housing Mix.

	Market Rate Units	Affordable Units	Total Units	Affordable % (Required 10%)
Rocky Hill Affordable Summary	341	38	379	10.0%

South Neighborhood For-Sale Homes

Type	Approx. Size	Market Rate Units	Affordable Units	Total Units	Affordable % (Required 10%)
Single Family	2,706 SF	10	1	11	9.1%
Duplex	2,341 SF	18	2	20	10.0%
Triplex	1,848-1,945 SF	32	4	36	11.1%
Fourplex	2,000-2,160 SF	14	2	16	12.5%
South Total		74	9	83	10.8%

North Neighborhood Rentals

Type	Approx. Size	Market Rate Units	Affordable Units	Total Units	Affordable % (Required 10%)
Studio	609 SF	7	1	8	12.5%
1BR	707-869 SF	151	17	168	10.1%
2BR	1,050-1,460 SF	96	10	106	9.4%
3BR	1,660 SF	13	1	14	7.1%
North Total		267	29	296	9.8%