



August 28, 2026

City of Amesbury
Conservation Commission
39 South Hunt Road
Amesbury, MA 01913

Re: Notice of Intent – Supplement #4
Rocky Hill MBTA Community at Elm Street
265, 277, 281, 287, and 287½ Elm Street, Amesbury, Massachusetts
MassDEP File #002-1362

Members of the Amesbury Conservation Commission:

On behalf of Dale Development, LLC, and in association with Millenium Engineering, Inc., Lucas Environmental, LLC (LE) is pleased to submit this Supplement to the Notice of Intent (NOI) filed with the Amesbury Conservation Commission for the proposed Rocky Hill MBTA Community residential development located at 265, 277, 281, 287, and 287½ Elm Street in Amesbury, Massachusetts (Assessor's ID Map 68: Lots, 12, 13, 15, 20 & Map 80: Lots 3, 4). This Supplement #4 has been prepared to address the few remaining housekeeping items and remaining minor materials requested for review at the previous Conservation Commission hearing on August 3, 2026, and the final Site Plans and Stormwater Report, both revised through August 17, 2026 to address VHB's remaining comments. Additionally, following a conversation with Amanda Armington, Sustainability & Conservation Planner, the Applicant has provided a limited response to the BETA Group, Inc. (BETA) peer review letter, dated August 12, 2026.

The submitted materials in this Supplement include the following:

1. Revised Site Plans (final revision date: August 17, 2026).
2. Revised Stormwater Management Report (final revision date: August 17, 2026).
3. Long-Term Pollution Prevention and Operations and Maintenance (O&M) Plan (final date: August 28, 2026).

In lieu of a formal response to BETA August comment letter, Ms. Armington requested that the Applicant provide additional information to address Comment W17, further detailed on the next page. The remaining comments noted Special Conditions in which the Applicant is amenable with one exception for Comment W23. Ms. Armington agreed that the PWS overseeing the construction (Lucas Environmental, LLC) would be appropriate to identify specific location of the plantings in the restoration areas, with submission of a completion report when the work is finished and prior to any monitoring requirements. The Applicant is amenable to this.

Regarding Comment W15, Ms. Armington confirmed that the Applicant provided appropriate information for the BVW impacts and that further information for compliance with the performance standards is not required, consistent with other recent projects in the City for similar boardwalks.

For brevity, only the most recent comment from BETA related to Comment W17 is identified below in *italics* as BETA3. The Applicant's response is provided in standard format.

- W17. ***BETA3: The locations of the RA Restoration Areas have been added to the plans. The New England Wildflower Mix and the New England Conservation/Wildlife Mix are identified on the planting schedule for the RA restoration areas; however, these mixes do not appear to be appropriate for BVW restoration, as they do not contain a majority of FACW species. The plans do not identify an additional Wetland Seed Mix or the species within the seed mix that will be used within the BVW. BETA defers to the Commission regarding the acceptance of the proposed restoration activities within the BVW, including whether tilling should be permitted as part of the restoration effort and whether an alternative seed mix should be provided for wetland restoration.***

The following Wetland Seed Mixture is proposed (or equivalent) within the 4,570 square foot BVW within the proposed Restoration Area. The Applicant is amenable to a Special Condition to include this specification within the construction plans upon approval from the Commission. As noted, the current owner of the land has the right to till and work the fields. As such, the Applicant requests the Commission allow the tilling prior to seeding. If the Commission is not amenable, the area will not be tilled prior to seeding. The Applicant defers to the Commission's preference on the tilling, which will only occur one time prior to seeding.

NEW ENGLAND WETLAND SEED MIXTURE		
Species	Latin Name	Indicator Status
Swamp Milkweed	<i>Asclepias incarnata</i>	OBL
Starved/Calico Aster	<i>Aster lateriflorus</i>	FACW
Beggar Ticks	<i>Bidens frondosa</i>	FACW
Fringed/Nodding Sedge	<i>Carex crinita</i>	OBL
Hop Sedge	<i>Carex lupulina</i>	OBL
Lurid/Shallow Sedge	<i>Carex lurida</i>	OBL
Blunt Broom Sedge	<i>Carex scoparia</i>	FACW
Fox Sedge	<i>Carex vulpinoidea</i>	OBL
Spotted Joe Pye Weed	<i>Eutrochium maculatum</i>	OBL
American Mannagrass	<i>Glyceria grandis</i>	OBL
Blue Flag	<i>Iris versicolor</i>	OBL
Fowl Bluegrass	<i>Poa palustris</i>	FACW
Soft Rush	<i>Juncus effusus</i>	FACW
Square Stemmed Monkey Flower	<i>Mimulus ringens</i>	OBL
Green Bulrush	<i>Scirpus atrovirens</i>	OBL
New York Ironweed	<i>Veronia noveboracensis</i>	FACW



500A Washington Street, Quincy, MA 02169

For the Commission's convenience, the revisions to the Plans have been clouded on Sheets C5.1 and C6.0. The revisions include the reduction in size of infiltration pond #1, which was pulled ten feet further back from the resource area, and adding an on-street handicap parking space in south neighborhood.

Enclosed please find two (2) copies of this NOI Supplemental Package. A link to an electronic copy of the pdf file of the NOI application and supporting documentation will be provided concurrently with this submittal via the OpenGov portal. LE will provide the electronic copy to the peer review consultants as discussed in the interest of time, and copy the Commission.

If you have any questions, please do not hesitate to contact me at 617.405.4140 or cml@lucasenviro.com. Thank you for your consideration in this matter.

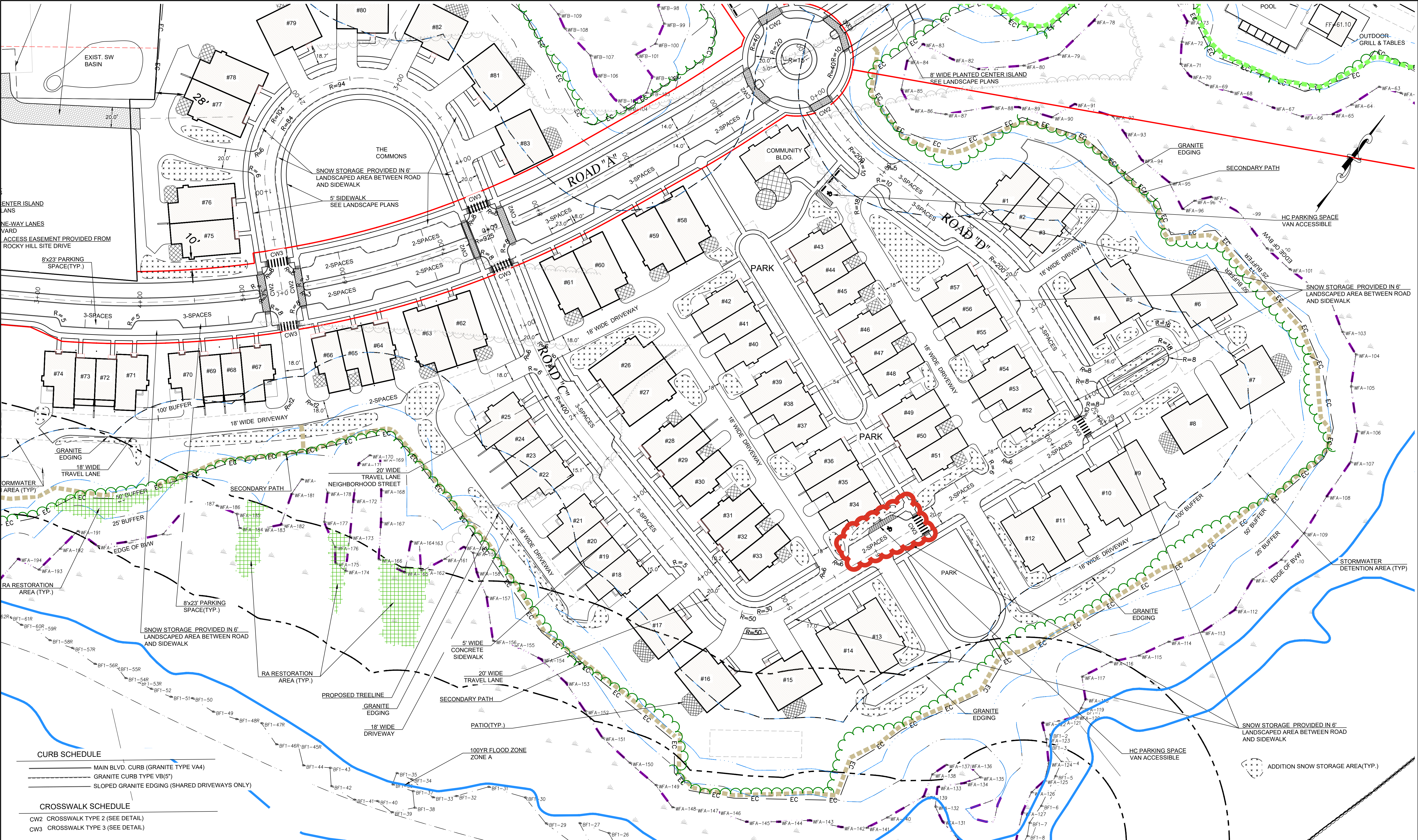
Sincerely,
LUCAS ENVIRONMENTAL, LLC

Christopher M. Lucas, PWS, CWS, RPSS
Certified Wetland Scientist/Professional Soil Scientist

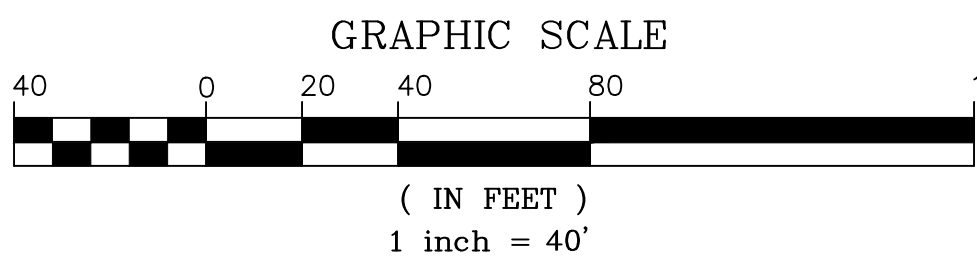
Enclosures:

1. 11x17 Markup of Sheets C5.1 & C6.0
2. Revised Site Plans
3. Revised Stormwater Management Report
4. Long-Term Pollution Prevention and Operations and Maintenance (O&M) Plan

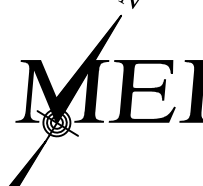
cc: Applicant: Dale Development, LLC – Robert Dale (electronic copy)
 Owners: True Homestead Limited Partnership(s) (electronic copy)
 287 Elm Street Realty Trust (electronic copy)
 Stanley O. Bean Jr. Revocable Trust (electronic copy)
 Millenium Engineering, Inc. (electronic copy)
 MassDEP – NERO (electronic copy, hard copy available upon request)



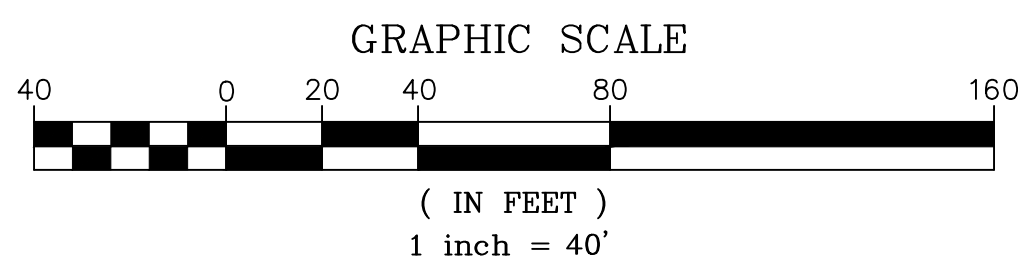
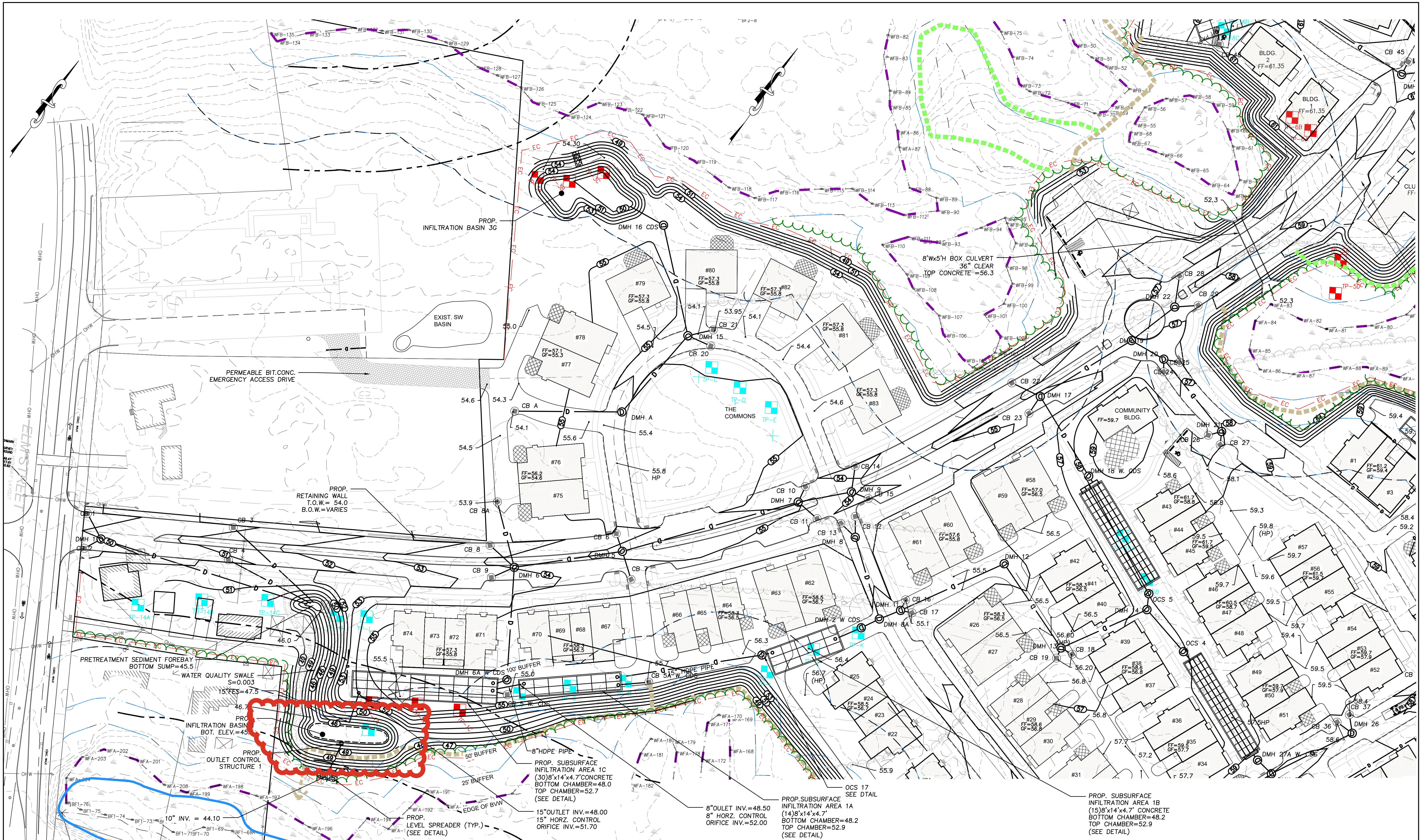
SOUTH NEIGHBORHOOD PARKING SUMMARY	
83 FOR SALE DWELLING UNITS	
154 GARAGED PARKING SPACES	
3 SHARED DRIVEWAY SPACES	
24 SECONDARY ROAD PARKING SPACES	
22 MAIN BOULEVARD PARKING SPACES	
1 VAN HC SPACE PROVIDED AT COMMUNITY BUILDING	
1 VAN HC SPACE PROVIDED ON PRIVATE ROAD	
83 EV READY SPACES PROVIDED IN GARAGE PARKING	
203 TOTAL SPACES	
7 TRAIL HEAD PARKING SPACES (1 HC SPACES)	



PREPARED FOR					
DALE DEVELOPMENT, LLC 360 WASHINGTON STREET RYE, NH 03870		5	8/17/26	PLAN SET UPDATE	S.B.S.
		4	6/29/26	PLAN SET UPDATE	S.B.S.
		3	6/19/26	NOI INTERIM UPDATE	S.B.S.
		2	3/24/26	PEER REVIEW UPDATE	S.B.S.
		1	12/22/25	PLANNING BOARD UPDATE	J.T.M.
	NO.	DATE		DESCRIPTION	BY

	MILLENNIUM ENGINEERING, INC. ENGINEERING AND LAND SURVEYING 62 ELM ST. SALISBURY, MA 01952 (978) 463-8980 13 HAMPTON RD. EXETER, NH 03833 (603) 778-0528	
	SCALE: 1"=40'	CALC. BY: J.T.M.
	DATE: AUG. 11, 2025	CHKD. BY: S.B.S.
		PROJECT: M244407

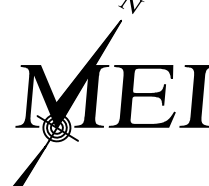
ROCKY HILL MBTA COMMUNITY IN AMESBURY, MA AT ELM STREET	
SITE LAYOUT PLAN 2	SHEET: C5.1



PREPARED FOR

DALE DEVELOPMENT, LLC
360 WASHINGTON STREET
RYE, NH 03870

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ROCKY HILL MBTA COMMUNITY IN AMESBURY, MA AT ELM STREET		GRADING & DRAINAGE
		SHEET: C-6.0