

December 17, 2025

Amesbury Planning Board
Amesbury City Hall
62 Friend Street
Amesbury, MA 01913

RE: Response Comments to Peer Review – Site/Civil Peer Review

Dear Board Members,

On behalf of Eagles Crossing LLC, The Morin-Cameron Group, Inc. (MCG) has provided the following responses to the peer review letter prepared by Vanasse Hangen Brustlin (VHB) dated December 4, 2025. VHB comments are *italicized*, followed by MCG's responses in **bold**.

Missing Materials

VHB COMMENT:

- *Erosion and Sedimentation Control Plan, (See Stormwater Management and Wetlands Compliance section below)*
- *Hydraulic Calculations for Storm Drain Pipes and Outlets, (See Stormwater Management and Wetlands Compliance section below)*
- *Retaining Wall Details, (See Conformance with the Zoning Ordinance section below)*
- *Landscape Plan Calculations, (See Conformance with the Zoning Ordinance section below)*
- *Shadow Analysis, (See Conformance with the Zoning Ordinance section below)*
- *Confirmation of Lot Consolidation (ANR Plan) (See Subdivision of Land and Site Plan Special Permit Regulations section below)*
- *Groundwater Mounding Analysis (See Stormwater Management and Wetlands Compliance section below)*
- *Affordable Housing Compliance Materials, Applicant's Proposed Condition of Approval, (See Conformance with the Zoning Ordinance section below)*
- *Open Space Ownership & Maintenance Entity Formation Copies, Applicant's Proposed Condition of Approval, (See Conformance with the Zoning Ordinance section below)*
- *Deeds, easements, agreements and other legal documents, Applicant's Proposed Condition of Approval, (See Conformance with the Zoning Ordinance section below)*
- *"Location, quantity and unit size" of units accessible to the disabled, Applicant's Proposed Condition of Approval, (See Conformance with the Zoning Ordinance section below)*
- *Utility capacity confirmation (Planned Infrastructure & CIP), Applicant's Proposed Condition of Approval, (See Conformance with the Zoning Ordinance section below)*
- *Soils Report (See Conformance with the Zoning Ordinance section below)*
- *General Environmental Impact (See Conformance with the Zoning Ordinance section below)*
- *Building with Elevations (See Conformance with the Zoning Ordinance section below)*
- *Indoor Garage Layout Plan (See Conformance with the Zoning Ordinance section below)*

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MCG Response: Erosion and sediment notes are shown on the “General Notes, Legend & Abbreviations” sheet, proposed erosion control locations are depicted on the “Site Preparation & Demolition Plan”, and details of the erosion controls are depicted on the details sheets. The following documents have been included as supplemental information with this response letter:

- Hydraulic calculations for pipes and outlets
- Indoor garage layout plan
- Landscape Plan Calculations
- Indoor Garage Layout Plan
- Groundwater mounding calculations

The following items will be submitted under separate cover at a later date:

- Shadow Analysis
- Building with Elevations

The following documents have not been submitted, and the Applicant request these be incorporated into the conditions of approval to be submitted prior to building permit application:

- Retaining wall design (to be completed during building permit development)
- ANR Plan (to be prepared pending approvals)
- Affordable Housing Compliance Material (to be prepared pending approvals)
- Open Space Ownership and Maintenance Entity Formation Copies (to be prepared pending approvals)
- Deeds, easements, agreements and other legal documents (to be prepared pending approvals)
- “Location, quantity and unit size of units accessible to the disabled (to be completed during building permit development)
- Utility capacity and conformance with Planned Infrastructure Report and Capital Improvement Plan (to be prepared and coordinated with the Department of Public Works)
- Soils Report (waiver requested)
- General Environmental Impact (to be submitted to the Conservation Commission during the NOI permitting process)

CONFORMANCE WITH ZONING

SECTION VII: OFF-STREET PARKING AND LOADING REGULATIONS:

VHB COMMENT: The submitted plans do not clearly demonstrate that each building is served by ADA-compliant accessible parking spaces. Under 521 CMR 23.2 (Massachusetts Architectural Access Board), accessible parking spaces must be provided in each parking area and must be located on the shortest accessible route to an accessible building entrance. Similarly, the 2010 ADA Standards (Section 208.3.1) require that accessible spaces be dispersed and positioned to serve each accessible entrance rather than grouped in a single location. Particularly, it does not appear that Buildings A or B have any accessible parking spaces, although these may not be required for these use types. Also, there should not be any parking across the drive aisle if there is closer parking available building side. Because building entrances are not shown on the current plans, it is not possible to verify whether

accessible spaces are properly assigned, located, or connected by compliant routes.

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

- The number and location of accessible parking spaces serving each building or parking area.*
 - The location of accessible building entrances, and confirmation that each accessible space is situated on the shortest accessible route to those entrances.*
 - Confirmation that accessible routes meet the requirements of 521 CMR and the 2010 ADA Standards, including slopes, landings, and connection to sidewalks/walkways.*
- This information is needed to confirm compliance with applicable accessibility requirements.*

MCG Response: Until the project is further developed, it is unknown if Building A or Building B will include an accessible unit, but it is not anticipated at this time. However, if it is determined that either building will include an accessible unit, the ADA accessible spaces will be relocated to conform with the 2010 ADA Standards.

Per the ADA Design Standards, each parking facility must comply with the required number of ADA spaces. This project includes two (2) facilities, the above ground surface parking area and the underground garage parking area. The calculations for the number of spaces required/provided is noted on the Site Layout Plan (Sheet C-7).

The ADA spaces located across the drive aisle (east side of Building C) are located at the closet location to the building with an accessible route. The parking lot grades nearest the building typically exceed 3% and therefore are not suitable for accessible parking spaces which must be under 2%. The three (3) spaces located near the play area and (3) spaces located at the western entrance of Building C are anticipated to be restricted, short term parking at varying times (to be determined at a later date). The ADA spaces located at the western entrance will provide an accessible route to the proposed amenity area on the western side of the building.

The site has been designed to be in full compliance with all applicable ADA regulations. Final grading, locations of accessible parking spaces and accessible routes to the building will be enhanced in greater detail during the construction plan phase coinciding with the building permit application. This level of detail is not possible at this time without having the construction drawings by structural engineers, MEP engineers, architect and other professionals for the building in hand.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant clarify whether EV charging spaces are proposed, and if so, confirm that the design includes the required number of ADA- accessible EV spaces consistent with federal accessibility standards.

MCG Response: The site plans have been revised to show future EV underground electric conduit ("EV Ready") for 42 parking spaces total along the Northern parking (including an ADA accessible space). The conduit and location of EV ready spaces is shown on the Utility Plan (sheet C-9). Under the Stretch Energy Code at least 20% of spaces for new residential buildings shall be "EV ready". The project is proposing a total of 203 parking spaces for the site (surface parking and underground garage parking) making the total required "EV ready" parking spaces 41 spaces. The proposed 42 "EV Ready" parking spaces meet the requirements of the Residential Stretch Energy Code and ADA accessibility requirements.

SECTION XI.Q: SMART GROWTH OVERLAY DISTRICT:

DESIGN AND DEVELOPMENT STANDARDS:

VHB COMMENT: VHB recommends that the Planning Board requests the Applicant provide the required soils report prepared by a geotechnical consultant, including an assessment of erosion and sedimentation risks and the associated mitigation measures, consistent with the EESGOD submission requirements. This documentation will assist the Planning Board in reviewing the project's compliance with §10.5.e.2.b and evaluating the adequacy of proposed protection measures for development on or near steep slopes.

MCG Response: The Applicant has not engaged a geotechnical engineer for this stage of the project feasibility (i.e. Site Plan Approval). A geotechnical engineer will be engaged and can prepare the noted report as part of the construction drawing phase of the project following this planning board process. The Applicant requests that this requirement be a condition of approval and submitted prior to building permit.

VHB COMMENT: VHB recommends that the Planning Board requests the Applicant submit the required environmental impact report or, if applicable, confirm whether this report will be submitted as part of the NOI filing or a MEPA filing will be provided to the Board for their review. This documentation will assist the Planning Board in evaluating the project's environmental compatibility and compliance with the EESGOD submission standards. This requirement could be included as a condition of approval by the Board.

MCG Response: An environmental impact report is being prepared by the project's Wetland Scientist (LEC Environmental Consultants, Inc.) and will be submitted to the Conservation Commission during the Notice of Intent permitting process. The Applicant requests that submittal of this document to Planning Board be a condition of approval and submitted to the Planning Board once completed.

VHB COMMENT: VHB recommends that the Planning Board requests the Applicant provide preliminary architectural drawings that portray architectural elevations prepared, signed, and sealed by a registered architect, including building heights, rooflines, gross floor areas, garage plans and other required dimensional information, so the Planning Board can fully assess compliance with the ordinance and that they meet the Amesbury's Design Guidelines, adopted March 1999.

MCG Response: The noted plans will be submitted under separate cover at a later date.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant confirm that adequate driveway width, maneuvering space, and sight distance are maintained with these spaces in place. If necessary, the Applicant may wish to evaluate alternative layouts or operational measures to ensure safe and efficient access at the site entrance.

MCG Response: The first six (6) spaces located near the entrance to Clark Road provide adequate maneuvering space and do not create a safety hazard.

- The driveway aisle is designed in compliance with the Regulations and commonly accepted engineering practices.
- The first space is located 62' from the entrance to Clarks Road which provides sufficient distance for a vehicle to complete a 90 degree right turn into the driveway, which is adequately wide with 12' aisles in each direction (total width 24'). The vehicle, which will already be at a reduced speed making the turn, then will be aligned facing the parked cars and has adequate distance, at this reduced speed, to come to a full stop.
- Traffic calming surface changes at the entrance drive will further deter operators from hitting the accelerator upon entering the site.

- **Vehicles making a left turn in have an additional 15' of site distance with visibility from the lane opposite the site.**

VHB COMMENT: The plans show a stairway connection from the amenity area between Buildings B and C to the proposed public-access trail. While the Applicant does provide an accessible connection from the development to Clark Road, no ADA-accessible interior route is provided from the amenity space to the public trail.

See general comment regarding ADA in general comments section below.

MCG Response: There is no stairway from the amenity area to the trail (there are stepping stones set flush with surrounding grade to connect the trail to the amenity area). The proposed project was designed to deter public access from the public trail into the private amenity areas intended for residents. An accessible route from building A and B is provided along Clarks Road and an accessible route is provided as part of the public trail up to the building connector. However, it should be noted that the trail beyond the Building C connector has not been designed as an accessible feature given the existing topography and to minimize disturbance to the natural environment. Portions of the trail are in conformance with accessible guidelines, but the overall trail has been designed following the US Forest Service Trail Accessibility Guidelines which are referred to in both ADA and MAAB. Generally, for new trails, slopes are intended to follow the natural terrain of the land without causing extensive excavation or changes to grade and with that in mind, compliance with the slope requirements to the extent practicable is the standard.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant clarify the intended use of the 40-foot loading space and provide supporting information demonstrating that it can adequately serve anticipated operational needs.

In addition, VHB requests clarification on whether the cul-de-sac turnaround near the site entrance is intended to function as a drop-off or pick-up area, and if so, how short-term stopping will be managed to avoid disrupting circulation. Based upon the submitted truck turning templates, it appears that the emergency vehicles need the entire width of the cul-de-sac for their maneuverability. Therefore, VHB recommends that the Planning Board requests that the Applicant provide signage to prohibit the use of short-term parking in this area.

MCG Response: The loading zone has been modified to be a total length of 44'. The curbing has also been modified to allow better accessibility for vehicles into the loading zone. Based on prior projects with the same developer, this type of loading zone works effectively. A "Swept Path Sketch" has been prepared to show the maneuverability of two vehicles (Similar size to Amazon, UPS, Fedex, etc) utilizing the loading zone at the same time.

The sketch also depicts a scenario of a 30' "moving truck" being located in three (3) different locations in the cul-de-sac, with an emergency vehicle (i.e. ambulance) still being able to fully access/turn through the cul-de-sac. The ladder truck would not be able to turn around the cul-de-sac if vehicles are temporarily parked within the drive aisle but would still be able to access the drive aisle/building if needed. The swept path sketch also includes a turning figure to show the ladder truck can reverse to the underground garage and turn around if needed, removing a requirement for the ladder truck to reverse excessive distances to turn around.

The developer has extensive experience in owning and managing similar properties. The property manager will oversee moving truck schedules to not inundate the parking area or the building.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant clarify how trash and recycling vehicles will access and service the dumpster without interrupting circulation within this primary drive aisle. If the current location is intended to remain, the Applicant should confirm that service operations can occur safely and without restricting resident access, emergency access, or overall site circulation.

MCG Response: The Applicant has considered the comment and concluded that trash and recycling vehicle access will not adversely impact the proposed development. This enclosure type and size has performed effectively at similar developments developed by the applicant, with brief service interruptions managed without significant impacts. After consideration, the Applicant has no concerns that the temporary traffic impacts will not unduly affect residents, emergency access, or overall site circulation. If impacts are determined to be detrimental during operations, pickups can be adjusted and scheduled during off-peak times.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant submit the interior landscape percentage calculation for documentation and to confirm compliance with Section 10.5.c.6.

MCG Response: A sketch depicting the landscaping calculation has been included in the supplemental materials. The overall planting area is 5.6% and is in compliance with the 5% minimum.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant provide contact information for this entity should be provided to the Planning Board and appropriate City agencies.

The long term responsibilities of the property management should be documented and provided to the Planning Board. Should the management entity change, updated contact information should be provided to the City.

Because the project includes privately owned and maintained features, such as stormwater BMPs, internal roads, sidewalks, lighting, open spaces, and other shared infrastructure, clarity on ownership and maintenance responsibilities is necessary to confirm compliance with §10.5.d.4 and to ensure these systems are properly operated over time.

See Proposed Conditions of Approval section below.

MCG Response: This information is not available at this time as the management company would not be hired until close to completion of the building. This can be included as a condition of approval to be provided prior to issuance of a final occupancy permit. Regarding stormwater BMP's, the developer is the responsible party until such time that they name a new party to manage the property. This is described in the LTPPP included with the stormwater report and common practice. The final stormwater LTPPP should be provided with the final as-built for the project, coincident with the final building occupancy.

VHB COMMENT: VHB recommends the Planning Board requests the Applicant clarify how the project will meet the requirements of Section 10.13 for the Planning Board's information.

MCG Response: The project will meet Amesbury's building codes including its adoption of the Stretch Code. Depending on the editions in effect at the time of application for building permit, the Applicant may pursue LEED certification but does not wish to be conditioned to do so.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant confirm pole locations and heights, clarify whether building-mounted fixtures are included, and provide updated photometric information as needed to demonstrate compliance with Section 10.5.j and XI.C.8.i. The

Planning Board may also wish to consider whether lighting is appropriate along the proposed boardwalk and the path to the dog park given potential early-morning and evening use.

MCG Response: The light fixture/ pole locations are graphically shown on the Utility Plan (Sheet C-9). The light pole heights are 18' for parking lot, 12' for pedestrian sidewalk and 10' at building entries as noted on the Lighting Photometric Plan and are in compliance with the height requirements. Minimal lighting is provided at the dog park as shown on the photometric plan. It is our opinion that lighting is not necessary for the boardwalk, especially given the environmental sensitive location and our desire to minimally disturb the natural area beyond the building. The applicant also does not want to encourage use of the trail at night, similar to commonly accepted city rules for park access from dusk to dawn. Full design of all site features such as the light poles/bases have not been completed at this time and the Applicant requests that submittal of these documents to Planning Board be a condition of approval and submitted at a later date.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant should clarify how utility service to 27 Clarks Road will be maintained or modified, including whether the service is overhead or underground and how continuity will be protected during construction. In addition, the Applicant should submit written confirmation from DPW demonstrating that the project's water, sewer, and utility demands do not exceed available municipal capacity and that the proposed improvements are consistent with the City's Planned Infrastructure Report and Capital Improvement Plan, as required under §10.5.m.2.

See Proposed Conditions of Approval section below.

MCG Response: The existing overhead electric service to 27 Clarks Road encroaches onto the subject property and will be need to be relocated. Exact details for the relocation will be coordinated with the homeowner and utility provider at such time when an application is submitted and fee paid to the utility provider. The current design shows the relocated overhead wires, but exact location will be determined by the utility provider.

The Applicant and MCG have met with DPW to discuss utilities and existing adequacy at the project location. Based on discussions, the City's infrastructure is adequate to support the project but may require localized improvements including the extension of the water main from Macy Street and potentially upgrading the sewer from Macy Street to the project site. The City has hired an Engineering Firm to assess the water distribution system and extents of water upgrades will not be known until the analysis is complete in a few months. The existing sewer capacity is also being analyzed by MCG and coordinated with DPW to see if upgrades are required. All utility connections are governed by the DPW and the Applicant requests that this condition be deferred to the DPW and resolved prior to issuance of an occupancy permit.

It should also be noted that DPW has stated in a letter dated January 24, 2022, prepared by Robert Desmarais, Director of Public Works, submitted to MA Department of Housing and Community Development, that the development within the EESGD will not overburden the City's infrastructure, but limited upgrades may be required. This letter was prepared prior to establishing the Smart Growth District.

SUBDIVISION OF LAND AND SITE PLAN SEPCIAL PERMIT REGULATIONS

SECTION 2 DEFINITIONS:

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant clarify whether the lots have been formally consolidated.

If the existing lots have not been consolidated, then the project does not meet the setback requirements in the zoning regulations.

If so, the endorsed ANR plan or recording information should be provided. If consolidation has not yet occurred, the Applicant should confirm whether an ANR plan will be filed with the Planning Board consistent with M.G.L. c. 41 §81P. This could be a condition of approval.

MCG Response: If the project moves forward, the lots will be merged through the Planning Board's ANR process. This will not be completed until feasibility/permitting of the project is completed. The Applicant requests that completion of merging the lots be a condition of approval prior to issuance of a building permit.

SECTION 7 DESIGN STANDARDS:

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant should provide a written evaluation of LID feasibility that explains where LID practices were considered on the site, whether they are practicable in locations such as landscaped islands, pedestrian areas, the cul-de-sac, or patio spaces, and, if not feasible, the specific engineering basis for excluding them. This analysis should include explanations related to soils, groundwater, utilities, grading, or maintenance constraints as applicable. If feasible LID opportunities exist, the design should be revised to incorporate those practices to comply with §7.10(B).

MCG Response: The property currently has a permit through the States Comprehensive Permit Program, Chapter 40B for a Townhome style neighborhood. These plans include crossing the wetland with a road and developing the entire property. The current proposal is to consolidate the development on the street side of the wetland and preserve the entirety of the southern forest as open space. The very nature of this application is a low impact approach to development because it preserves the majority of the property as woodland. Through this effort, the development footprint was constricted as much as possible, thereby limiting space for other, LID stormwater measures. Usable open space was a secondary development objective and this is reflected in the design with a large park, dog park, walking trails and 360 pedestrian circulation. This further constrained space for LID stormwater measures which consume a large footprint of land. As such, stormwater is primarily addressed through structural practices with only a single, vegetated infiltration basin the rear of the property. That said, managing stormwater structurally is very efficient use of space because it is happening within the footprint of the parking area and generally not expanding further out into the forest.

STORMWATER MANAGEMENT AND WETLANDS COMPLIANCEWETLANDS COMMENTS:

VHB COMMENT: VHB notes that a complete NOI will be filed for all work located within the Resource Area and the 100- foot buffer zone so that the Conservation Commission may evaluate whether the proposed boardwalk complies with Section 21.6 and the performance standards of the Massachusetts Wetlands Protection Act.

MCG Response: A Notice of Intent has been filed with the Amesbury Conservation Commission.

STORMWATER COMMENTS:

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant complete at least one additional confirmatory test pit for each infiltration basin prior to construction, as a condition of approval. While VHB acknowledges that the full testing density may be conservative for a project of this scale, a minimum level of confirmatory testing would reduce uncertainty and help verify that the infiltration systems are feasible as designed. The Applicant should acknowledge that if additional testing reveals soil or groundwater conditions inconsistent with the design assumptions, redesign and re-review of the stormwater system may be necessary.

MCG Response: Due to existing site constraints select locations were chosen to perform the testing. The results of the soil testing was very consistent. Generally, the B horizon consists of free draining sand. This rests upon a silt layer. Groundwater is coincident with the silt layer. These conditions were found in every test hole and the depth to groundwater can be tracked with the surficial topography. Nearer to the wetland, the silt layer transition into clay. This was also very consistent and predictable. Based on the consistency and predictability of the soil tests, it was not prudent to demolish sheds, clear mature trees and disrupt residents and neighbors. A note has been added to the General Notes, Legend & Abbreviations sheet (C-3) to perform a test hole within the infiltration systems to confirm the ESHWT prior to installation. The Applicant requests that this requirement be a condition of approval to be completed during construction.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant clarify how the E.S.H.W.T. elevations were determined, specifically, whether field indicators were present in the test pits, whether mottling was observed, and whether any estimation methodology was used.

VHB was informed by the Applicant that the term "observed" was intended to indicate that mottling was observed in the test pits; however, VHB recommends that the Applicant provide documentation or supplemental notes confirming the field indicators used to establish the E.S.H.W.T. for each location.

MCG Response: Soil testing was conducted by a Massachusetts Certified Soil Evaluator, Scott P. Cameron, P.E. SE#3024. The estimated seasonal high-water table was determined by redoximorphic features (i.e. mottling). For clarity, the soil logs depicted on the site plans have been revised to note that "Mottling" was the field indicator that was used to determine the E.S.H.W.T. The mottling was distinct and occurred at the interface between the upper C sand layer and the lower C silt layer.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant provide a mounding analysis using an accepted analytical method and confirm that post-construction mounded conditions maintain the required separation and drawdown performance. The Applicant should also update the Standard 3 (Recharge) section of the MassDEP Stormwater Checklist to reflect the need for groundwater mounding evaluation and to document compliance once the analysis is completed.

VHB was informed by the Applicants engineer that the system was not believed to require a groundwater mounding analysis. Under MassDEP guidance, a mounding analysis is required when BOTH of the following are true:

- The vertical separation from the bottom of the infiltration (exfiltration) BMP to seasonal high groundwater is less than 4 feet (but at least 2 feet), AND*
- The recharge system is proposed to attenuate the peak discharge from a 10-year or larger 24- hour storm.*

Because the proposed infiltration systems provide less than 4 feet of separation and are used to attenuate the 10-year storm, VHB maintains its original comment and recommends that the Board require the Applicant to submit groundwater mounding analyses for each infiltration BMP.

MCG Response: A mounding analysis was performed for all 3 infiltration systems using the Hantoush Method. The saturated thickness was calculated based on the depth between the measured seasonal high-water table to the adjacent wetland, which occurs at elevation 24. This is a conservative assumption. The duration was calculated based on the drawdown time for the 100-year storm event volume, also a conservative approach. Based on the results of the analysis, mounding will occur beneath each infiltration system between 11" to 18" above the seasonal high-water table. However, it will not exceed the bottom of the basin in the center, the point of measurement, as each is designed to be 2 feet above the seasonal high-water table. Mounding will not impact the function of the infiltration systems.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant either:

- provide independent third-party verification supporting a TSS removal rate above 80% for the specific Stormceptor models, or*
- revise the treatment calculations to reflect an 80% TSS removal credit and confirm that the full treatment train continues to meet the requirements of Standard 4*

MCG Response: The Independent verification of the Contech Stormceptor hydrodynamic separator and Continuous Deflective Separator (CDS) treatment rates is provided with the supplemental information. TSS removal rates for each system have been revised to match the verified 80% (Stormceptor) and 75% (CDS) TSS removal rates verified through the 3rd party verification documentation and the full treatment train has been adjusted to show that the design continues to meet the requirements of Standard 4. For simplicity, the lowest TSS pretreatment removal rate was used going to Subsurface Infiltration System #1 (SIS #1). Revised TSS removal calculations are provided with the supplemental information.

VHB COMMENT: 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.

MCG Response: The catch basin locations were adjusted to be 2' off the corners.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant provide full hydraulic sizing calculations for all storm drain pipes, as well as design calculations for pipe outlets, riprap aprons, and any proposed level spreaders. This information is necessary to confirm compliance with Stormwater Standard 2 and the applicable design guidance in Vol. 2 of the Stormwater Handbook, and to verify that the conveyance system and outlet protection measures are appropriately sized.

MCG Response: The hydraulic sizing calculations for the site storm drain pipes/outlets and riprap apron/level spreaders sizing has been provided with the supplemental information. The plans have been revised to include this information.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant clarify the proposed approach for managing groundwater around and beneath the garage, including whether perimeter or underslab foundation drains are proposed, how such drains will discharge, and how long-term pumping or dewatering requirements (if any) will be addressed. This information is needed to

evaluate potential interactions with the stormwater system and ensure that the design complies with applicable stormwater and wastewater regulations.

MCG Response: Given the predictability of the soil and groundwater conditions on this site compared to other sites in till or bedrock, MCG expects both slab and foundation drainage to be part of the building design. Approximately 1/3 of the building will be above the water table. Consideration will be made in the slab and foundation drain design for the onsite infiltration systems, and if measures need to be incorporated such as impermeable barriers to better direct groundwater flow. Given these parameters, and high confidence with subsurface conditions on this property, MCG recommends a condition that this groundwater management system design be submitted prior to issuance of a building permit.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant review the configuration of DMH-4 and confirm that the manhole size, pipe orientations, and invert elevations can be constructed without conflict. A larger structure or alternative pipe layout may be necessary to resolve these issues.

MCG Response: DMH-4 has been increased to a 5' diameter to reduce any potential pipe conflicts/constructability. A detail showing the DMH layout has been incorporated into the plan set on Details Sheet C-15.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant review the grading and drainage patterns within these landscaped areas and confirm whether additional drainage structures or minor regrading are needed to provide positive drainage to the stormwater system. Any revisions should demonstrate that runoff from these areas is managed in a manner consistent with MassDEP Stormwater Standard 2 (conveyance and peak flow control) and does not result in standing water or nuisance conditions.

MCG Response: Final grading and drainage of these areas has not been completed at this time. However, the stormwater system has been designed to account runoff from these areas. Final design of these areas will be completed during the development of the building permit plans. The Applicant requests that final design of these areas be a condition of approval and submitted prior to issuance of an occupancy.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant provide a hydrostatic pressure and mounding evaluation prepared by the structural and/or geotechnical engineer of record demonstrating that the nearby infiltration systems will not impose adverse hydraulic loads on the garage and that appropriate waterproofing or structural measures are incorporated as needed.

MCG Response: A geotechnical engineer will be engaged during the building construction document phase following the Planning Board process. The Applicant requests that this requirement be a condition of approval and submitted prior to issuance of a building permit.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant provide documentation demonstrating that the infiltration systems have been evaluated and designed for all applicable structural loads, including vehicular traffic. This analysis should confirm compliance with manufacturer specifications and standard engineering practice for load-bearing installations.

MCG Response: The infiltration systems were designed using HDPE pipe. Per the manufacturer of ADS N-12, a 12" pipe requires 12" minimum cover to achieve a HS-25 load rating. The proposed cover exceeds the 12" minimum in all locations. The plans note that "all stormwater conveyance pipes shall be HDPE (ADS N-12) or project civil engineer approved equivalent" on

the storm drain notes on the General Notes, Legend & Abbreviations sheet. Documentation from the manufacturer has been included in the supplemental material.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant reevaluate the grading and inlet layout in the vicinity of the garage ramp, including the location of the low point and the four catch basins. This evaluation should consider shifting the low point away from the garage entrance, reconfiguring the inlets, and/or providing a defined overland relief path so that, under surcharge or failure conditions, ponded water is directed away from the garage opening rather than into it.

MCG Response: A low point was created at the garage entry in order to reduce the slope of the ramp. Four (4) catch basins were located in the vicinity of the garage to manage, capture and convey stormwater from this low point. As a redundancy, a trench drain was located at the top of the ramp 0.4' higher than the catch basin rims. If the catch basins clogged, the trench drain would capture any additional runoff prior to flowing down the ramp. As a secondary redundancy measure (and to capture runoff generated on the ramp itself) a second trench drain was located at the bottom of the ramp prior to entering the garage. This trench drain conveys stormwater under the garage slab and ultimately to the proposed infiltration basin. In the event that stormwater conveyed to infiltration basin #2 (through DMH-4 and WQU-4) is under failure conditions or surcharged, stormwater is conveyed down gradient directly to the infiltration basin.

GENERAL ENGINEERING & PLAN COMMENTS

WETLANDS COMMENTS:

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant submit updated plans prior to the submittal for a building permit to demonstrate compliance with 521 CMR and ADA Standards for all required accessible routes. Any changes to grading, pathways, or circulation required to achieve compliance should be resubmitted to the Planning Board for acknowledgment, as these revisions may alter approved site design elements. This could be a condition of approval.

MCG Response: It is understood that the project must comply to 521 CMR and ADA Standards. Minor changes from the planning board plans to the final construction documents are normal and expected because until the project moves past the Planning Board phase, the vast majority of technical design team is not engaged (structural, MEP, fire, architectural, interior design, etc). All of this design needs to be coordinated with the Civil Engineering drawings. Typically, a copy of the final construction drawings are submitted to the Planning Department and the normal process is followed by staff or the board to determine if the technical fine tuning warrants a public hearing or administrative review. The Applicant requests that this requirement be a condition of approval and submitted prior to issuance of a building permit.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant confirm whether these wider spaces are intentional (e.g., for operational or maneuvering purposes) or if it should be revised for consistency with the site's parking layout.

MCG Response: The site plan has been revised to make all spaces consistently 9' wide other than the compact spaces.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant provide the

following information to document compliance with 527 CMR 1.00 / NFPA-1:

- Confirmation of whether the building will be fully sprinklered under NFPA 13;
- Measured hose-reach distances from the fire-access road to all exterior walls; and
- Written confirmation from the Amesbury Fire Chief, as the AHJ, verifying that the proposed access layout is acceptable under NFPA-1 §18.2.3.1.4 and that any required alternative fire- protection measures have been reviewed and approved.

This could be a condition of approval that this letter and plans are provided.

MCG Response: The Applicant and MCG met with the Fire Chief (Chief Serino) on November 6, 2025 to review the project and comments noted in a memorandum to Rebecca Frey dated October 13, 2025. Based on discussions, minor modifications to the site plan have been made including landscape modifications and hydrant locations. With the modifications incorporated, the Chief noted his support for the project and overall site design. The building will be fully sprinkled and designed in conformance with NFPA regulations. The final design will require review and approval from the Fire Department during the Building Permit submission. The Applicant requests that additional information related to fire protection be a condition of approval and submitted to and approved by the Fire Department prior to issuance of a building permit.

VHB COMMENT: A second means of access and egress to the site is not provided for the site and a median could potentially provide that for the project. VHB recommends that the Planning Board requests that the Applicant work with the City, in particular the fire department, to provide additional information illustrating how a median could be incorporated, or consider viable alternative fire-access routes, such as a reinforced travel path north of Building A, that could satisfy the Fire Department's operational requirements.

MCG Response: As noted previously, the Fire Chief has reviewed the site design and had no issues for access pending the minor modifications to the site that have already been incorporated into the design. The Applicant has also studied a median at the entrance and has concluded that a single 24' entrance suites the site best. Adding a landscape island inhibits turning movements of emergency apparatuses, limits the width of the median to 6' and is not sufficient to support mature trees, and would place Building A and Building B closer to the abutters. Therefore, it was determined that the single curb cut with no median is an appropriate design for the site. However, as part of the entrance review, modifications were made to enhance the entry appearance. These modifications include adding landscape strips between the drive aisle and sidewalk to create a tree belt at the entry when entering the site.

VHB COMMENT: Because the submission identifies these routes as publicly accessible or intended to serve programmatic elements of the development, they must either comply with accessible route requirements or be supported by a documented exemption applicable to outdoor developed areas. No accessibility classification, exemption justification, or supporting documentation was included in the submission. As a result, VHB cannot confirm whether either pathway is intended to be accessible or whether the Applicant is proposing them as non- accessible recreational trails

MCG Response: The proposed path was not designed as an accessible path. However, access to the all amenity areas will be accessible, including accessing the dog park via an accessible route through the garage.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant re-evaluate the

grading strategy behind Building C to ensure that runoff is managed effectively, amenity areas are constructible and stable, and long-term maintainability is achievable. Consideration should be given to introducing retaining walls or other structural elements to reduce reliance on extensive 2:1 slopes and to create more functional benches or terraces for seating and circulation. Also, the Applicant should consider using native vegetative planting for these slopes to ensure long term stability. The design should also identify a clear and practical access route for maintenance vehicles to reach the stormwater basin, including adequate slope, width, and stabilization measures. Revised grading plans or additional design details may be necessary for the Planning Board to fully assess the feasibility and long-term performance of this area. Also, see comment above regarding geotechnical study / soils report.

MCG Response: The rear of the building was designed to limit structural elements and grading within resource area buffer zones. Limited areas with 2:1 slope were designed to achieve grading requirements and will be fully stabilized and vegetated. Vegetation will include low maintenance native plantings and slope stabilization measures implemented prior to vegetation establishment. Stabilization methods have been included on the detail sheet (C-16) for implementation once grading is complete. Areas that include a 2:1 slope have been highlighted on the revised plans. It is our opinion that the select areas with 2:1 slopes will be able to be fully stabilized for long term stability.

The amenity areas will require fine grading to ensure adequate slopes/level areas at the proposed benches. Small retaining features (i.e. boulders) may be required to create a leveled area. The Applicant requests that additional information related to fine grading of the amenity areas be a condition of approval and submitted to and approved by the Planning Board prior to issuance of a building permit.

The proposed path along the eastern property line will also function as an access route for the stormwater basin maintenance and rear building maintenance. The access path continues from the path, across the top berm of the infiltration basin and connects to the relatively level path behind the building. It is our opinion that the width and slope is adequate for machinery, materials and personnel to access the stormwater basin and rear of building for maintenance purposes.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant reassess the snow storage layout and identify practical, durable areas that can accommodate snow loads without damaging plantings or diminishing required screening. Revised plans should clearly delineate viable snow storage locations that do not conflict with landscaping or buffer requirements.

MCG Response: As discussed with the Board at previous meetings, the snow storage on site is limited. Areas shown for snow storage are for small storm events, while it is the Applicant's understanding that snow removal from the site will most likely be required during larger storm events or when adequate storage onsite is not available. The landscape plans have been revised to show herbaceous non-woody vegetation in areas of proposed snow storage that will not result in damaged plantings during winter months.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant increase the sidewalk width, or otherwise provide measures to preserve the full pedestrian clear path, in all locations where vehicular overhang would reduce the effective sidewalk width.

MCG Response: It is our opinion that the sidewalk widths are adequate for a project of this type. The provided parking spaces are all compliant to zoning requirements and are 18' in depth. It is understood that vehicle parking and overhanging parking spaces is difficult to regulate and may occur. However, an eighteen (18) foot deep parking space, six (6) inch curb and five (5) foot

sidewalk is provided. It is our opinion that this layout is adequate to allow vehicle parking without impeding pedestrian circulation through the site even if vehicle overhang does occur.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant should provide the Planning Board with a copy of the completed NPDES Notice of Intent (NOI) and the fully developed SWPPP prior to the start of construction. This can be included as a condition of approval to ensure compliance with federal permitting requirements.

MCG Response: A NPDES NOI filing and SWPPP will be prepared prior to construction. The Applicant request that submission to the Planning Board of this documentation be a condition of approval to be submitted prior to the start of construction.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant should provide detailed plans and specifications for all fencing, outdoor recreation areas, patio spaces, and the dog park, including materials, heights, surfacing, access points, and any associated site features. These details should be submitted to the Planning Board for review to confirm that the proposed amenities can be safely constructed, properly maintained, and integrated into the overall site design.

MCG Response: Precedent images of fencing were submitted to the Planning Board for review on November 18, 2025. The Applicant requests that submission of additional details to the Planning Board of final material selections be a condition of approval as an administrative staff review prior to issuance of the building permit.

WAIVER REVIEW STATEMENT

SECTION XI.Q: SMART GROWTH OVERLAY DISTRICT:

DESIGN AND DEVELOPMENT STANDARDS:

VHB COMMENT: VHB recommends that the Board requests clarification on whether visitor parking is included in the total parking supply, and if so, where those spaces are located. If visitor parking is not designated, the Applicant should explain how visitor demand, including overnight parking, will be accommodated consistent with the operational and safety criteria outlined in Section 10.5.b.3. Final acceptance of the reduced parking ratio remains at the discretion of the Planning Board.

MCG Response: Visitor parking is included in the total parking count. Final visitor parking locations and number will be determined by the future building operations management and modified as needed. Parking within the drive aisles will be strictly prohibited. Parking along Clarks Road is prohibited and will be enforced by local authorities.

VHB COMMENT: VHB recommends that the Planning Board consider whether the limited dimensional benefit achieved by these compact spaces justifies their inclusion, or whether maintaining uniform standard stall dimensions may better serve long-term functionality for residents and visitors. If the Board determines that the compact stalls are acceptable under the alternative configuration provisions, then a formal waiver may not be required; however, the Applicant should confirm the necessity and rationale for the proposed compact spaces to assist the Board's decision-making. At this time, VHB has not received or reviewed the proposed indoor parking layout.

MCG Response: The indoor garage parking layout is included with the supplemental materials. Based on existing properties, the Applicant has determined that compact spaces (reduced width to 8') are adequate and appropriate for a development of this type. Vehicles have a range of sizes

and it is our opinion that including eight (8) exterior and eight (8) interior garage compact spaces are appropriate.

VHB COMMENT: VHB recommends the Planning Board requests the Applicant clearly label and detail the retaining wall within the frontage buffer and confirm that the reduced width can accommodate required grading and planting without creating operational or maintenance issues. VHB notes that by reducing the setback, it could impact site lines and driveway length which could reduce pedestrian safety. VHB defers to the Planning Board regarding the appropriateness of the buffer reduction as a zoning waiver.

MCG Response: There is no retaining wall located in the front setback. The proposed wall is ornamental. The height of the wall will be designed to not impede sight lines.

VHB COMMENT: VHB recommends that as a condition of the waiver, complete retaining wall details, including height, materials, configuration, terracing (if applicable), drainage, safety fencing, and any associated landscaping be provided, so that the Planning Board can evaluate compliance with Section 10.5.c.2.

Structural design and stability of the proposed retaining walls should be prepared, signed, and sealed by a licensed structural engineer and will require review and approval by the Building Department as part of the building permit process.

Determination as to whether the proposed wall height, finish, and associated waiver are acceptable remains at the discretion of the Planning Board.

MCG Response: The walls will be designed by a structural engineer and submitted for review/approval during the building permit application process. The wall designs will incorporate industry standard drainage and safety fencing requirements. The Applicant request that submission of additional details to the Planning Board of final material selections be a condition to be reviewed administratively by staff and that the final wall design, should it require a building permit, be handled by the building department.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant clearly identify all fencing types and locations on the plans so the Planning Board can evaluate the requested waiver. The acceptability of stockade and chain link fencing under Section 10.5.c.3 is a zoning determination for the Board.

MCG Response: Precedent images of fencing were submitted to the Planning Board for review on November 18, 2025. While the EESGOD in one place prohibits stockade and chain link fence, in section 10.5.e.1c it requires "solid wooden fencing at least 6 feet high". The Applicant has proposed stockade fencing in select locations to enhance screening and privacy for neighbors, and black chain link in another location to enhance views from the amenity areas to the surrounding natural area.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant confirm that appropriate slope stabilization and retaining wall measures will be provided based on geotechnical recommendations. The waiver itself is a zoning determination for the Planning Board.

MCG Response: Slope stabilization methods will be implemented as noted previously. Pending project approval, a geotechnical engineer will be engaged and will review all site and wall designs. The Applicant requests that this requirement be a condition of approval and submitted prior to construction.

VHB COMMENT: VHB recommends that the Planning Board requests that the Applicant provide a shadow study and plan depiction of the shed at 31 Clarks Road to allow verification of the potential shading impact described in the waiver request. The Planning Board should determine whether §10.5.0 applies to accessory structures such as sheds and whether the Applicant's waiver request is justified based on the study results and the regulation's intent.

MCG Response: The noted plans will be submitted under separate cover at a later date.

In addition to the comment responses noted above, the following supplemental materials are also included in this response:

- Revised site plans (revised through 12/17/2025)
- ADS N-12 Pipe cover requirements
- Parking area landscape calculations
- Revised TSS Calculations
- Third party TSS documentation
- Pipe sizing calculations
- Garage parking sketch
- Rip-Rap sizing calculations
- Mounding calculations
- Swept path sketch

We trust this information adequately addresses the peer review comments by VHB about the proposed multi-family residential development at 27.5 & 29 Clarks Road.

If you have any questions, please do not hesitate to contact our office at (978) 777-8586.

Sincerely,

THE MORIN-CAMERON GROUP, INC.



William A. Schkuta, P.E.

Director of Engineering

Attachments

cc: Eagles Crossing LLC