



June 23, 2026

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

Re: Notice of Intent – Supplement #2
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 #2 has been prepared to in response to the BETA Group, Inc. (BETA) peer review letter, dated May 14, 2026, and following the working session with the City of Amesbury Office of Community and Economic Development (OCED) staff, and peer review consultants VHB, Inc. and BETA.

The Applicant has revised the plans to address the peer review for the Conservation Commission as well as the Site Plan Review process with the Planning Board. The submitted materials include the following:

1. Revised Civil Drawings: Site Layout, Grading & Drainage, Construction Details (revision date: June 19, 2026)
2. Revised Landscape Plans (revision date: June 22, 2026)
3. Invasive Species Management Plan

The full revised Plan set will be submitted within the next week to the Planning Board and Conservation Commission for a record copy, which will include the erosion control sheets.

The BETA Comments are identified below in *italics*. The Applicant's responses are provided in standard format.

PLAN AND GENERAL COMMENTS

A1. *The Massachusetts Department of Environmental Protection (MassDEP) has issued the DEP file No. 002-1362 with the following technical comment:*

While the project has obtained an ORAD, it should be noted that the latest FEMA maps show a Zone A associated with the Powwow River tributaries on the site.

Response: Acknowledged. The Applicant notes that the purpose of an ORAD is to lock in resource areas for a period of three years to ensure consistency in design and review. Further discussion regarding the current FEMA mapping is below in Comments W18 & W19.

- A2. *A registered PLS stamp is present on the boundary lines sheets C-3.0 through C-3.2; however, no PLS stamp is present on the existing conditions plans on Sheets C-3.3 through C-3.8. A PLS stamp should be provided on the existing conditions plans.*

Response: Please Note the Board of Registration allows a civil engineer to stamp existing conditions and topography plans. MEI will also provide a PLS stamp on the final existing conditions plans to be recorded at the South Essex Registry of Deeds.

- A3. *A survey benchmark should be provided on the plans.*

Response: The elevations shown on the plans are based upon NAVD88. The final Plans will provided a benchmark reflecting this datum.

- A4. *All Resource Areas and Buffer Zones should be shown and accurately labeled on all plan sheets depicting proposed work. Currently, the 100-foot Buffer Zone is not shown on the landscape plans, and flags numbers are not depicted on all plan sheets.*

Response: The 100-Foot Buffer Zone has been added to the updated Landscape Plans and flag numbers are now shown on all Site Plan sheets.

- A5. *Provide a note on the plans referencing the approved ORAD in effect for the Site.*

Response: Note referencing ORAD has been added to the Existing Conditions Plan which will be included in the final Plans.

CONSTRUCTION COMMENTS

- W1. *The Project, as currently depicted, will disturb more than one (1) acre of land; therefore, a Notice of Intent (NOI) must be submitted to the Environmental Protection Agency (EPA) under the Construction General Permit (CGP) and a Stormwater Pollution Prevention Plan (SWPPP) must be prepared. The Commission could consider a Special Condition within the Order of Conditions that requires the submission of the SWPPP for review and approval prior to the commencement of work.*

Response: As typical for a project of this size disturbance, a Notice of Intent will be submitted to the Environmental Protection Agency (EPA) under the Construction General Permit (CGP) and a Stormwater Pollution Prevention Plan (SWPPP). This will be included as part of the Construction Management Plan to be reviewed by the City. As typical, the Site Contractor will need to be included in the preparation of this plan.

- W2. *Silt sacks should be depicted on the catch basins along Elm Street near the construction entrance.*

Response: Concur, silt sack will be added to catch basins within 100 feet of the Construction Entrance.

- W3. *The temporary earth stockpile locations that are depicted between the WFB-92 to WFB-111 and WFB-55 to WFB-68 Series BVWs and upgradient of flag WFA-76 should be relocated outside of the 100-foot Buffer Zone to BVW. If this is not feasible, erosion and sedimentation controls should be depicted around the entire stockpile/staging area within Buffer Zones.*

Response: Concur, all stockpile locations will be located outside the 100-Foot Buffer Zone with notation added for erosion controls to be provided if located within any Buffer Zones.

- W4. *Erosion and sedimentation controls should be depicted between the proposed work and the B Series WFB-92 to WFB-111 and WFB-55 to WFB-68 wetland.*

Response: Concur, the erosion control barrier has been updated in accordance with this comment, and will be identified on the final Plans.

- W5. *The proposed location of erosion and sedimentation controls conflict with proposed grading at the following locations:*

- North of house #80;
- West of Building #2;
- Adjacent to the following flags: WFA-185, WFA-180, WFA-170, WFA-146, and WFA-107;
- South of the G3 building; and
- East of Building 18.

Response: Concur, the erosion and sedimentation controls have been updated reflecting revised site plan design and grading, and will be identified on the final Plans.

- W6. *The proposed work does not appear constructable without some level of temporary and/or permanent impacts to BVW to facilitate access and sufficient space to work at the following locations:*

- | | |
|-------------------------|--|
| • WFB-104/WFB-103; | 4 feet |
| • WFB-117/WFB-118; | 25 feet |
| • WFB-32R; | 10 feet |
| • WFB-36; | 2 feet |
| • WFB-53/WFB-54; | 10 feet, No grading, 4-foot wide bark mulch path |
| • WFB-90; | No impact path removed |
| • WFA-49; | 25 feet |
| • WFA-11; | 25 feet |
| • WFA-21/WFA-22; | 26 feet |
| • WFA-28; | 9 feet |
| • WFA-32; | 10 feet |
| • WFA-42/WFA-43/WFA-44; | 100+ feet |
| • WFC-14; and | 5 feet |
| • WFC-21. | 2 feet |

Response: The Plans have been modified pulling the limit of work away from resource areas at many locations. At all locations noted, all earthwork fill operations occur upgrade from the resource areas providing a minimum two feet separation from resource areas providing enough space for erosion control barriers to be installed and maintained. The Applicant worked with the Planning Department to increase these setback areas and reduce temporary Buffer Zone impacts. The approximate distance from each flag to the proposed work is provided above.

- W7. *The Project will require a significant area of earthwork. A preliminary phasing plan has been provided; however, a more detailed phasing plan to supplement the erosion control plan that limits the total area of disturbance at the Site should be provided, with provisions to temporarily stabilize previous phases as appropriate before further advancing work.*

Response: The filling operation is expected to take approximately five to six months to bring the project up to the final rough grade. During this time, specific erosion control measures will be implanted as needed to control and consternated runoff areas. The project will be subject to weekly inspections, monitoring, and implementing any additional erosion control measures needed.

- W8. *Proposed snow storage is shown within the 100-foot Buffer Zone to multiple wetland series and within the 200-foot RA. Snow storage should be relocated outside of the 100-foot Buffer Zone to wetlands and RA where feasible.*

Response: Snow clearing will be located as far as practical from the resource areas. Note the runoff from the melting piles will be collected and treated though the stormwater management system.

MITIGATION COMMENTS

- W9. *The Applicant should confirm if species proposed to be planted within jurisdictional areas are native species as not all plantings are labeled.*

Response: Yes, the plans were revised to note this.

- W10. *Invasive species including glossy buckthorn (*Frangula alnus*), Japanese knotweed (*Fallopia japonica*), garlic mustard (*Alliaria petiolata*), bush honeysuckle (*Lonicera spp.*), and bittersweet (*Celastrus orbiculatus*) are present at the Site. The Applicant should provide information and Best Management Practices (BMPs) regarding how work will be conducted to ensure invasive species do not spread as a result of construction.*

Response: An Invasive Species Management Plan (ISMP) has been prepared to address this for the limit of work for the project (enclosed).

- W11. *Areas of Buffer Zone and RA proposed to be restored post-construction should be monitored for at least three (3) growing seasons to demonstrate successful establishment of plantings and limited invasive species pressure.*

Response: Two seasons is required per the WPA, and an ISMP has been prepared to control invasive species establishment. The Applicant is amenable to three years of monitoring if the Commission so requires.

- W12. *It is recommended that areas subject to native plantings/restoration within jurisdictional areas be mowed only once per year during late fall; this could be included as a Special Condition. If so, it is recommended that signage be required to demarcate these areas and this requirement in the field.*

Response: Areas proposed for meadow will be mowed only once per year in the later fall.

- W13. The species included in the proposed seed mixes that will be used for stabilization should be provided on the plans.

Response: The Landscape Plans have been revised to note this.

- W14. Further details should be provided regarding the proposed deed restrictions that are mentioned within the NOI submittal. The Conservation Commission could consider imposing Project milestones that require that deed restrictions to be in place before work progresses further.

Response: This is not currently proposed and was a relict from a previous application used as a template for this NOI. No deed restrictions are proposed. The Applicant has agreed to a Conservation Restriction, which should be incorporated as a Special Condition in the issued Order of Conditions.

BYLAW REGULATORY COMMENTS

- W15. *The Applicant should provide information describing how the Project was designed to comply with the Performance Standards set forth at Section 20(d)1 and 2 as significant permanent alterations including 41,525 square feet of structures, 130,170 square feet of hardscape, 1,150 square feet of stone outfalls, and portions of the stormwater management system are proposed within Buffer Zone in close proximity to the wetland boundary.*

Response: Based upon a working session with the OCED and the Public Hearing with the Conservation Commission on June 1st, the Applicant has made significant revisions to the project design to avoid and minimize impacts to the Buffer Zones. The major project revisions include the following:

- A. Removal of two large constructed stormwater wetlands and a large infiltration basin from the Buffer Zone, which substantially reduced the impacts to the Buffer Zone.
- B. Building #18 was shifted 25 feet away from resource areas.
- C. The proposed trail has been revised to avoid the 25-Foot Buffer Zone to the extent feasible, as requested by the Conservation Commission. There is approximately 460 linear feet of trail currently proposed inside the 25-Foot Buffer Zone, at the limit of work at the bottom of the fill slope. The surface is natural ground or improved with a ground bark mulch surface and four feet wide.
- D. A portion of the proposed Riverfront Area Restoration is located within BVW. As such, the project will also provide approximately 4,570 square feet of wetland replication.
- E. The following table summarize the proposed impacts within the Buffer Zone and subsequent reduction through the project revisions.

BUFFER ZONE IMPACT TABLE			
Impact Area	Impact (SF)		
	Original	Revised	Difference
100-Foot Buffer Zone Area			
Total	805,270	805,270	0
Total Land Disturbance	490,800	468,677	-22,123
Structures	41,525	31,685	-9840
Paving, Walk & Hardscape	130,170	129,360	-810
Landscaping & Stormwater Treatment Areas	286,879	292,085	+5,206
25-Foot Buffer Zone			
Temporary Land Disturbance	31,076	15,567	-15,509
Drainage Stone Outfalls	1,150	359	-791

Additionally, the Applicant has offer the following mitigation options for unavoidable impacts to the remaining Buffer Zone areas:

1. ISMP
2. Wildlife Corridor
3. Boardwalk to Wetland
4. Conservation Restriction
5. Trail Crossing to southern off-site parcels.

The first three mitigation measures have been directly incorporated in the Plans and this response package. The two additional mitigation measures should be conditioned as part of the project, as the boardwalk and trial crossing will require additional and separate permitting with the City of Amesbury.

The Applicant has proposed a wildlife corridor beneath the main boulevard, providing a connector for Wetland A and B, near flags WFA-83 and WFB-63. The corridor is proposed as an eight-foot wide, by 66-foot long, by three-foot long precast, three-sided culvert. A four-foot by four-foot light chimney with grate is proposed in the landscaped section of the center of the boulevard. Wingwalls are proposed at each end. A detail has been provided in the Plans.

The Applicant has incorporated a boardwalk into Wetland A between flags WFA-60 & 61, at the request of the OCED as a mitigation measure for the project impacts. The boardwalk is proposed as a five-foot wide, by 34-foot long, by 30-inch high elevated walkway, with a six-foot by 10-foot viewing platform. Per Millenium Engineering, the proposed permanent impacts to the BVW at this location are approximately five square feet for the helical pile installation. Approximately 230 square feet of temporary impacts are proposed for potential vegetation clearing of trees and shrubs. A wetland mitigation area is proposed as noted above. A detail has been provided in the Plans.

WPA PERFORMANCE STANDARDS COMMENTS*BORDERING VEGETATED WETLAND (310 CMR 10.55)*

- W16. *The Applicant should evaluate areas where work is proposed up to the wetland boundary outlined in Comment W6 and determine if impacts will be required for this work.*

Response: At all locations noted, all earthwork fill operations occur upgradient from the resource areas providing a minimum two feet separation from resource areas providing enough space for erosion control barriers to be installed and maintained. See Response to Comment W6.

- W17. *Within the supplemental documents, the Applicant states that a portion of the proposed Riverfront Area Restoration is located within BVW, and that a 4,570-square-foot wetland replication area is proposed; however, no further details have been provided regarding the proposed BVW impacts, compliance with Performance Standards, or the replication area. The plans should be updated to depict the location of BVW impacts with erosion and sedimentation controls depicted at the limits of work. Information should be provided to clarify whether the proposed plantings are for BVW enhancement or if there is a separate replication area. Plantings within the BVW boundary should include wetland species appropriate for the area. An updated WPA form should also be submitted that discloses all proposed impacts.*

Response: The area is currently part of the legally mowed and maintained agricultural fields. No impacts to the BVW proposed, only restoration of the area, which is shown on the Site Plans within the proposed Restoration Area. A separate specification can be provided for this area; however, it was intended that the area would be reseeded and left to naturalize otherwise to wetland, as soil amendments are not anticipated, although tilling may be warranted and can be determined at the time of installation. Select pages of the WPA Form have been provided for project-wide revisions and impact assessment.

BORDERING/ISOLATED LAND SUBJECT TO FLOODING (310 CMR 10.57)

- W18. *Although the ORAD was approved as having no BLSF or ILSF present on the Site, according to Panels 25009C0107G and 25009C0106G both dated July 8, 2025, portions of the Site associated with the Powwow River Tributaries are mapped as Zone A with no Base Flood Elevation (BFE). The Applicant has overlaid the locations of BLSF on submitted maps and BLSF does not appear to intersect with a majority of proposed work. However, the Commission should determine if a BFE should be established for the Site to determine the extent of BLSF. Additionally, work including grading to construct a stormwater basin is proposed directly adjacent to BLSF near flag A11. The Applicant should confirm that no impacts to BLSF will result as a part of work.*

Response: As discussed and generally agreed during the working session, the proposed limits of clearing and grading are located entirely outside of the mapped floodplain. As shown on the Plans, the low point on Elm Street where the stream crosses beneath the roadway is at approximately Elevation 46.5. All proposed site work is located above this elevation, with the exception of a very small area of grading associated with Infiltration Basins 1 and 2.

Based on the existing topography, floodwaters would need to exceed Elevation 46.5 and overtop Elm Street before any flooding could begin to affect the project area. To our knowledge, such conditions have never been observed at this location. Accordingly, the proposed work is not expected to be impacted by flooding and will not adversely affect flood storage or conveyance within the area. Based upon the site conditions and topography, a BFE would not be required for this project site.

- W19. *The Applicant has not provided calculations to determine if the C Series wetland is an ILSF; however, there are no direct impacts proposed to this wetland. BETA defers to the Commission on whether further evaluation of the presence of ILSF is warranted.*

Response: As discussed and generally agreed during the working session, the topography between the flags A-49 & A-50 and C-28 & C-30 does not impound water within the C Series isolated wetland area. The grade slopes from elevation 56 in the IVW down to elevation 54 at the edge of the BVW with no berm or highpoint between. The area does not contain a confined depression, nor could it hold at least six inches of water based upon visual observations, therefore, further engineering analysis was not warranted.

RIVERFRONT AREA (310 CMR 10.58)

- W20. *The Applicant has provided a narrative detailing how the Project complies with the Performance Standards for degraded RA at 310 CMR 10.58(5); however, areas of the RA that are not considered degraded are subject to the Performance Standards at 310 CMR 10.58(4). Only the locations of the existing gravel drive, structures, and decks should be examined under 310 CMR 10.58(5) and all other work within RA must comply with the Performance Standards at 310 CMR 10.58(4). Details regarding how the Project complies with these Performance Standards set forth in the Act should be provided. The alternatives analysis that will be provided for impacts to non-degraded RA should also detail the alternatives for the structural stormwater management measures proposed within RA as required by the Regulations. MassDEP has previously applied both sets of regulations to a single Site as noted in the attached Superseding Order of Conditions (SOOC) issued under MassDEP File No. 002-1012.*

Response: LE respectfully disagrees with this assessment of the RFA performance standards. LE previously provided email correspondence from 2022 from the MassDEP Northeast Regional Office (NERO) that “MassDEP does not split Riverfront Area (RA) review between “previously developed” and not.” Furthermore “So MassDEP’s position is that if “a portion” of RA is degraded, the entire project is reviewed under 10.58(5). If “no portion” of RA is degraded, the entire project is reviewed under 10.58(4).” Additionally, a Superseding Order of Conditions (SOC) is not binding and case law that went through an Adjudicatory Appeal through OADR has not been provided otherwise. As such, the project is subject to the redevelopment standards and has been appropriately evaluated.

Note that the impact calculations from Table 5-1 on the following page have been updated based upon the project revisions. Impact calculations that have been reduced are in red for clarity. As RFA impacts have been further reduced, a detailed discussion is not warranted, as the project was previously compliant with the redevelopment standards with greater impacts.

**TABLE 5-1 - REVISED
RIVERFRONT AREA IMPACT ANALYSIS**

RFA Description	Existing (SF)	Original Proposed (SF)	Revised Proposed (SF)	Difference (SF)
Total RFA On-Site	341,962	341,962	341,962	0
Degraded Areas				
Structures & Decks (Permanent)	875 (0.26%)	2,822 (0.83%)	2,822 (0.83%)	0
Gravel Drive	3,135 (0.92%)	0 (0.00%)	0 (0.00%)	0
Pavement (Permanent)	0 (0.00%)	3,008 (0.88%)	2,679 (0.78%)	-329
Patios (Permanent)	0 (0.00%)	870 (0.25%)	870 (0.25%)	0
Total Degraded Areas	4,010 (1.18%)	6,700 (1.96%)	6,371 (1.86%)	-329 (0.10%)
Non-Degraded & Disturbed Areas				
Lawn & Field Areas	27,928 (8.2%)	0 (0.0%)	0 (0.0%)	0
Landscaped Areas	0 (0.0%)	8,443 (2.5%)	7,504 (2.2%)	-939
Temporary Impact Areas*	0 (0.0%)	26,537 (7.8%)	16,183 (4.7%)	-10,354
Stormwater (Permanent)	0 (0.0%)	17,731 (5.2%)	6,592 (1.9%)	-11,139
Total Non-Degraded & Disturbed Areas	27,928 (8.2%)	52,711 (15.5%)	30,279 (8.8%)	-22,432 (6.7%)
Total Degraded & Non-Degraded Areas	31,938 (9.4%)	59,411 (17.5%)	36,650 (10.7%)	-22,761 (6.8%)
Restoration				
Restored Temporary Impact Areas	0 (0.0%)	26,537 (7.8%)	16,183 (4.7%)	-10,354
Restoration Areas	0 (0.0%)	8,780 (2.6%)	11,031 (3.2%)	+2,251
Total Restoration Areas	0 (0.0%)	35,317 (10.4%)	27,214 (7.9%)	-8,103 (2.5%)

Note that the temporary impact restoration was reduced as the overall temporary impacts in the RFA have been reduced. A summary of RFA impacts is as follows:

Permanent impacts =	20,467 sf [6,592 + 2,822 + 2,679 + 870 + 7,504]	6.0% (9.7%)*
Temporary Impacts =	16,183 sf	4.7% (7.8%)
Total RFA Impacts =	36,650 sf [20,467 + 16,183]	10.7%(17.5%)
Total Net Impacts =	9,436 sf [36,650 (impact) - 27,214 (restoration)]	2.8% (7.0%)

*() is the previous impact amount.

- W21. *“Figure 5 – Existing RFA Impact Areas” does not depict the conditions of the eastern extent of RA where portions of structures, decks, pavement, and stormwater management are proposed. The non-developed RA within the limit of work should be quantified and depicted on this figure. “Figure 6 – Proposed RFA Impact Area” does not include the impacts associated with the driveways and structures at the western extent of RA and does not quantify a corner of the parking near unit 71. “Figure 7 – Proposed RFA” Impact Areas does not accurately depict the extent of permanent impacts to RA. These figures should be revised to reflect the existing and proposed conditions of RA.*

Response: Figures 6 through 8 have been updated to reflect the project revisions. Additionally:

- Figure 5 is only showing the EXISTING conditions, therefore no proposed work was identified.
- Figure 6 has been revised to reflect the project revisions.
- Figure 7 accurately depicts the permanent impacts to RFA.

- W22. *The NOI narrative provides details regarding construction of the RA restoration area including excavating the area to a minimum of six inches below the final design elevation; however, the grading plans do not depict grading within this location. The Project plans should be updated to depict all proposed work at the Site.*

Response: Subgrades are not typically shown on the plans. Final grades for the RFA Restoration Area has been identified on the Plans. Note that no regrading is proposed within the legally mowed and maintained agricultural fields within the Restoration Areas.

- W23. *The Applicant should provide a planting plan for the RA restoration areas as a planting list has been submitted with no plan.*

Response: The location of trees and shrubs in the field is intended to be planted randomly under the supervision of a qualified PWS. A detailed planting plan showing the location of each tree/shrub is not proposed to allow for field specific conditions, substitutions, and other factors that need to be controlled during construction. This is common practice and reasonable for this project. If so required, the project could be conditioned to include the Restoration Area specifications on the Landscape or Site Plans.



500A Washington Street, Quincy, MA 02169

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 understands that you will provide the electronic copy to the peer review consultants.

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. Revised WPA Form (select pages)
2. Invasive Species Management Plan
3. Revised Figures 6, 7 & 8
4. Revised Civil & Landscape Plans

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)



Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands

WPA Form 3 – Notice of Intent

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Provided by MassDEP:

MassDEP File Number

Document Transaction Number

Amesbury

City/Town

B. Buffer Zone & Resource Area Impacts (temporary & permanent) (cont'd)

For all projects affecting other Resource Areas, please attach a narrative explaining how the resource area was delineated.

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
a. ☐ Bank	1. linear feet	2. linear feet
b. ☐ Bordering Vegetated Wetland	0	4,570
	1. square feet	2. square feet
c. ☐ Land Under Waterbodies and Waterways	1. square feet	2. square feet
	3. cubic yards dredged	

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
d. ☐ Bordering Land Subject to Flooding	1. square feet	2. square feet
	3. cubic feet of flood storage lost	4. cubic feet replaced
e. ☐ Isolated Land Subject to Flooding	1. square feet	
	2. cubic feet of flood storage lost	3. cubic feet replaced
f. ☒ Riverfront Area	Unnamed tributary to Powwow River	
	1. Name of Waterway (if available) - specify coastal or inland	

2. Width of Riverfront Area (check one):

☐ 25 ft. - Designated Densely Developed Areas only

☐ 100 ft. - New agricultural projects only

☒ 200 ft. - All other projects

3. Total area of Riverfront Area on the site of the proposed project: 341,962
square feet

4. Proposed alteration of the Riverfront Area: **See Supplement #2 for Revised RFA Impact Analysis.**

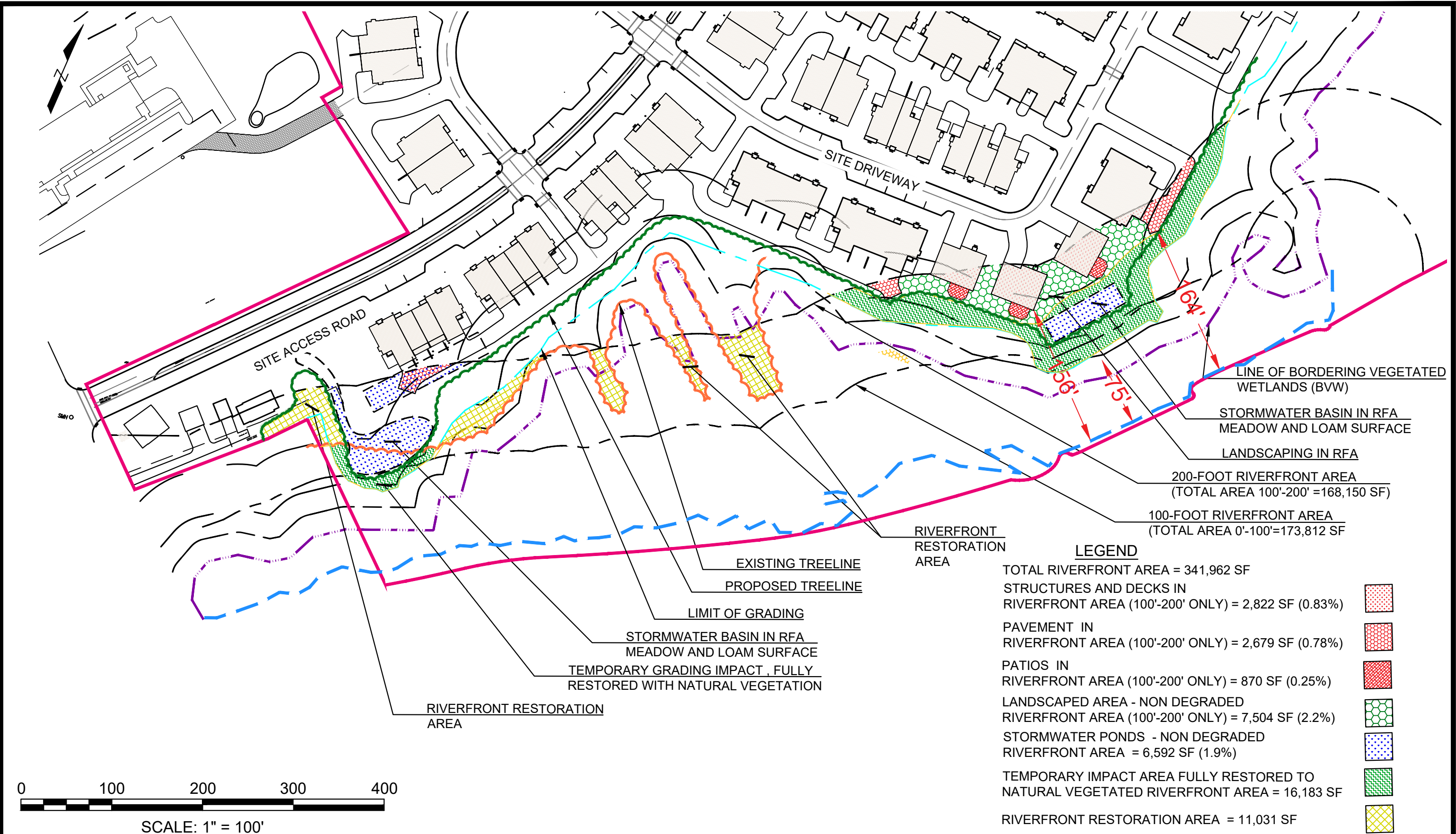
<u>20,467 - Permanent</u>	<u>0 - Perm; 3,211 - Temporary</u>	<u>20,467 - Perm; 12,972 Temp</u>
a. total square feet	b. square feet within 100 ft.	c. square feet between 100 ft. and 200 ft.

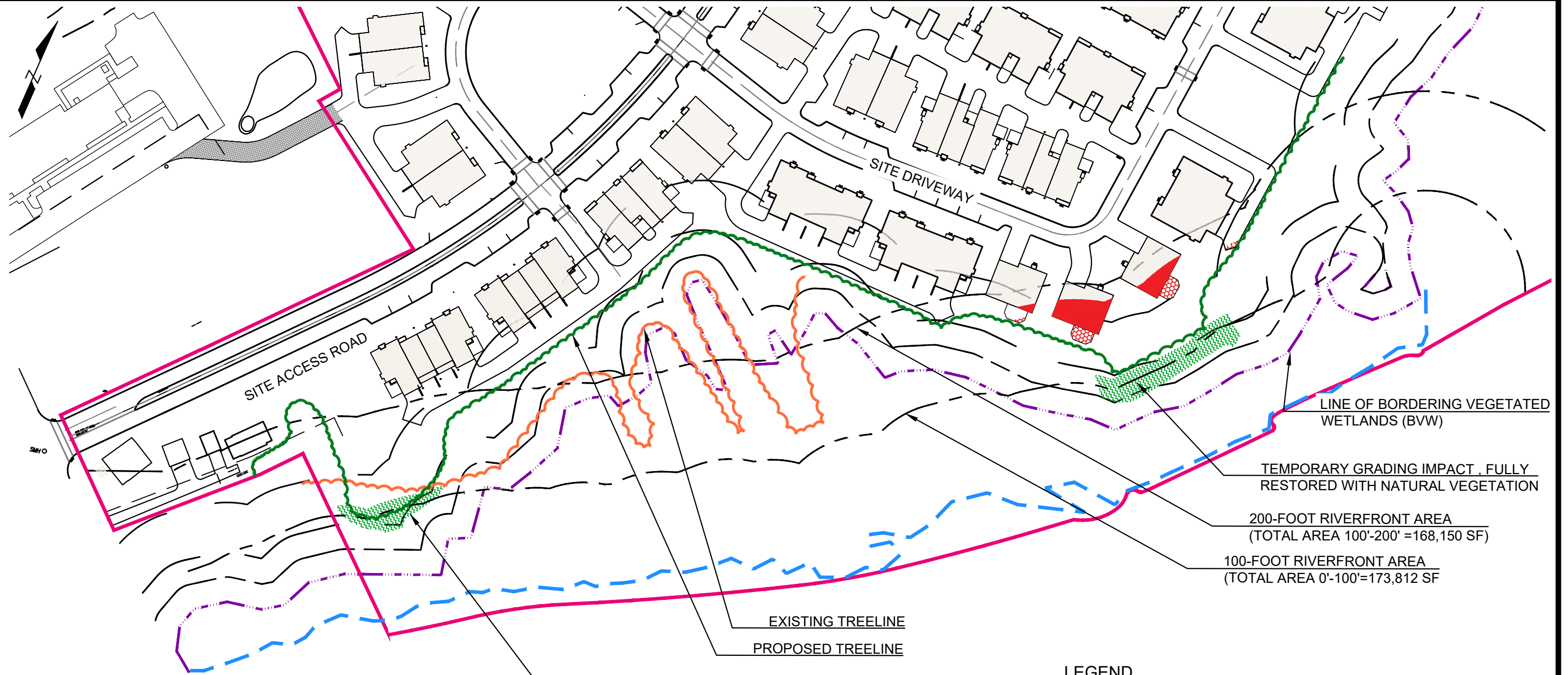
5. Has an alternatives analysis been done and is it attached to this NOI? ☐ Yes ☒ No

6. Was the lot where the activity is proposed created prior to August 1, 1996? ☒ Yes ☐ No

3. ☐ Coastal Resource Areas: (See 310 CMR 10.25-10.35)

Note: for coastal riverfront areas, please complete **Section B.2.f.** above.



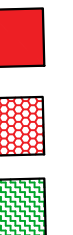


LEGEND

STRUCTURES AND DECKS IN RIVERFRONT AREA (WITHIN 184' TO RFA) = 2,040 SF (0.6%)

PAVEMENT & PATIOS RIVERFRONT AREA (WITHIN 172' TO RFA) = 613 SF (0.2%)

TEMPORARY GRADING IMPACT AREA FULLY RESTORED TO NATURAL VEGETATED RIVERFRONT AREA (WITHIN 110' TO RFA)= 5,912 SF (1.7%)



0 100 200 300 400

SCALE: 1" = 100'



MILLENNIUM ENGINEERING, INC.
ENGINEERING AND LAND SURVEYING

SITE NAME/ADDRESS

SITE NAME AND ADDRESS
ROCKY HILL
MBTA COMMUNITY
DEVELOPMENT
AMESBURY, MA

SHEET NAME

PROPOSED RFA IMPACT
AREAS
FIGURE 7

DR BY: JM

CHK BY: SS

PROJ NO.: M244407

DATE: 6/11/2026

SCALE: 1" = 100'

TOTAL 100 FOOT BUFFER AREA = 805,270 SF

TOTAL LAND DISTURBANCE IN THE
WETLAND BUFFER AREA = 468,677 SF

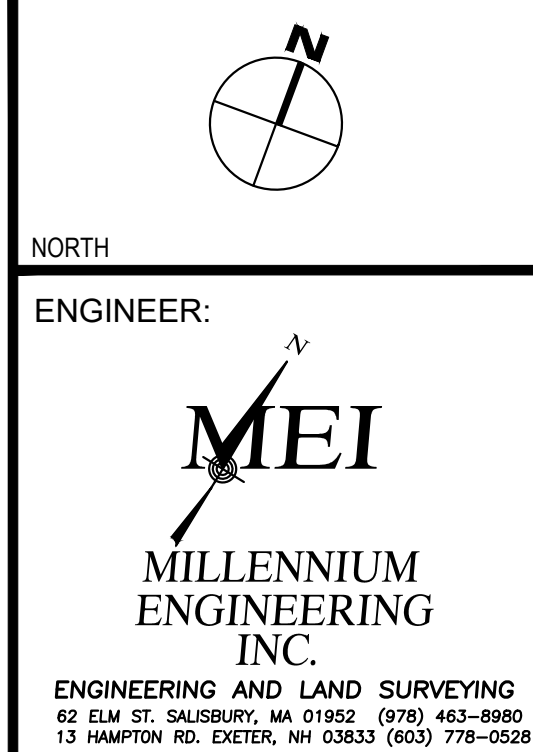
STRUCTURES IN THE
BVW BUFFER AREA = 31,685 SF

PAVING, WALK & HARDSCE IN THE
BVW BUFFER AREA = 129,360 SF

LANDSCAPING & STORMWATER TREATMENT AREAS
IN THE BVW BUFFER AREA = 292,085 SF

TEMPORARY LAND DISTURBANCE IN THE
25 FT. WETLAND BUFFER AREA = 15,567 SF

DRAINAGE STONE OUTFALL IN THE
25 FT. WETLAND BUFFER AREA = 359 SF



APPLICANT
DALE DEVELOPMENT, LLC
360 WASHINGTON ROAD
RYE, NH 03870

REV	DESCRIPTION	DATE
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PROPOSED BUFFER ZONE IMPACT AREAS

FIG. 8

DATE: 6/11/2026