



August 16, 2023

Reading Conservation Commission
c/o Charles Tirone, Conservation Administrator
16 Lowell Street
Reading, MA 01867

Re: Request for Plan Change – Maillet, Sommes and Morgan Conservation Area
0 Lowell Street and 0 Willow Street, Reading, Massachusetts
MassDEP File No. NE-270-0747

Dear Members of the Conservation Commission:

On behalf of the Applicant, the Town of Reading, and in accordance with Special Condition #20, the Horsley Witten Group, Inc. (HW) is submitting this request for a modification to the limit of work approved under the Order of Conditions (OOC) issued on August 3, 2021. Please recall that the OOC permitted open space and stormwater improvements as part of a larger, grant-funded effort through the Municipal Vulnerability Preparedness program (MVP) designed to address current and future flooding within the Mystic River Watershed and improve climate change resiliency and water quality while advancing environmental justice and open space connectivity.

The project, currently under construction, involves the installation of a constructed stormwater wetland system to address local flooding and improve water quality within the Aberjona River. The project also seeks to enhance existing resource areas through native plantings and invasive species control, as well as improve the existing trail system onsite with development of accessible trails, formalized trail markers, educational signage, and seating areas.

T.Ford Company, Inc. (T.Ford), the selected Contractor, has submitted a Request for Information (RFI) regarding the additional wetland crossing and extension of the limit of work to HW for further clarification. RFI 001 and HW's response are provided as **Attachment 1** to this letter. This request for plan change is being submitted by HW on behalf of T.Ford, in order for the Contractor to more efficiently and effectively complete the construction of the various phases of the project.

Specifically, T.Ford noted that the installation of the 24-inch HDPE pipe across the wetland ('Reverse Slope Pipe') and the subsequent construction of the permanent 10-foot wide wetland boardwalk crossing, would require a wider temporary wetland crossing. The extension of the limit of work would allow T.Ford to maintain access for construction vehicles to both sides of the proposed constructed wetland for the remaining project schedule (September 2023 to June 2024). The current project schedule is attached to this letter for reference (**Attachment 2**).

HW has made several suggestions and recommendations for the Contractor regarding RFI 001 to limit the temporary impacts within the Bordering Vegetated Wetland (BVW), including the following:

- The wetland crossing should be located on the north side of the approved crossing area to limit impacts to trees within the wetland to the south;
- Timber mats should be provided with adequate spacing to maintain hydraulic connectivity within the wetland;
- Additional erosion and sediment controls (ESCs) including sediment sock and orange temporary construction fencing are recommended on the north side of the boardwalk to prevent sediment from equipment being deposited in the wetland;
- Silt sock and orange temporary construction fence should be installed along the wetland boundary in areas where vehicular traffic is prohibited following the installation of the 24-inch Reverse Slope Pipe.
- Individual tree protection may be necessary for four existing trees adjacent to the new limit of work boundary.

The proposed modification to the limit of work would result in an additional, temporary BVW disturbance of approximately 2,030 square feet (SF) (with a total proposed wetland disturbance, including the originally approved wetland crossing of 3,530 SF).

HW conducted a site visit on August 14, 2023 to evaluate the existing conditions of the proposed disturbance area as well as the plant community composition. A summary of the existing vegetation distribution is provided in **Table 1** and **Photos 1-3** document site conditions. Approximately 25% of the area is comprised of invasive species, while the remaining 75% of this area currently supports native plant species.

Timber matting installed for an extended period of time will likely impact the health and viability of the existing plant species. HW has recommended that T.Ford restore the proposed area of disturbance (+/-2,030 SF) as shown within the RFI (001) following the removal of the timber matting and prior to substantial completion.

HW also noted during recent inspections that the current approved limit of work has already been encroached upon (within the wetland) during tree removal activities conducted the week of August 7, 2023. The estimated area of disturbed wetland beyond the approved limit of work is approximately 200 SF. HW strongly recommends that that area be restored regardless of the Conservation Commission's decision on the additional wetland crossing request.

Table 1. Existing Plant Community within Proposed Expansion of Limit of Work in BVW

Species	Native (N) or Invasive/Non-Native (I/NN)	Approx. % Cover (mid-points)
TREES		
red maple (<i>Acer rubrum</i>)	N	10.5
SHRUBS/SAPLINGS		
silky dogwood (<i>Cornus amomum</i>)	N	10.5
multiflora rose (<i>Rosa multiflora</i>)	I/NN	10.5
European buckthorn (<i>Rhamnus cathartica</i>)	I/NN	10.5
HERBS		
sensitive fern (<i>Onoclea sensibilis</i>)	N	20.5
jewelweed (<i>Impatiens capensis</i>)	N	10.5
poison-ivy (<i>Toxicodendron radicans</i>)	N	10.5
Virginia-creeper (<i>Parthenocissus quinquefolia</i>)	N	10.5
northern lady fern (<i>Athyrium angustum</i>)	N	10.5
wrinkle-leaved goldenrod (<i>Solidago rugosa</i>)	N	10.5
tall goldenrod (<i>Solidago altissima</i>)	N	10.5
common grass-leaved-goldenrod (<i>Euthamia graminifolia</i>)	N	10.5
multiflora rose (<i>Rosa multiflora</i>)	I/NN	3.0
European buckthorn (<i>Rhamnus cathartica</i>)	I/NN	10.5
Asiatic bittersweet (<i>Celastrus orbiculatus</i>)	I/NN	3.0
WOODY VINES		
fox grape (<i>Vitis labrusca</i>)	N	20.5
red raspberry (<i>Rubus idaeus</i>)	N	10.5
Asiatic bittersweet (<i>Celastrus orbiculatus</i>)	I/NN	10.5



Photo 1. Wetland encroachment following tree removal and prior to ESC installation (Looking northeast)



Photo 2. Area proposed for additional wetland impacts (Looking northeast)



Photo 3. Area proposed for additional wetland impacts. Looking southwest

The attached documents include a figure depicting the proposed crossing, and a proposed restoration planting plan of the area that closely follows the wetland restoration plan shown on the approved project plans, entitled “Mystic River Watershed, Maillet Conservation Area, Reading, Massachusetts” dated May 2021 and incorporated into the construction plans (“Maillet, Sommes and Morgan Constructed Wetland, Reading, Massachusetts, March 2023, Construction Set.” The restored wetland area would also be monitored for restoration success, as described in the original Notice of Intent (NOI) narrative and approved in the OOC. It is anticipated that the entire project will result in an overall improvement to the interests protected by these resource areas.

On behalf of the Town, HW respectfully requests that the Conservation Commission review and approve the proposed temporary expanded wetland crossing and the restoration plan as described, per the requirements under Special Condition #20 of the OOC, under both the Massachusetts Wetlands Protection Act (M.G.L. Ch. 131 § 40) and the Town of Reading General Bylaw (Section 7.1).

Enclosed please find two copies of this request and supporting documentation. An electronic copy of all materials has been submitted to the Commission and copied to the Massachusetts Department of Environmental Protection (MassDEP), Northeast Regional Office.

Thank you in advance for your consideration of this request. We look forward to meeting with you later this month both on site and at the public hearing scheduled for August 23, 2023. If you have any questions and/or require additional information pertaining to this submittal, please contact me at (508) 833-6600 or at jrelstab@horsleywitten.com.

Sincerely,

Horsley Witten Group, Inc.

A handwritten signature in black ink that reads "Jennifer Relstab". The signature is written in a cursive style with a large, looping initial "J".

Jennifer R. Relstab, P.E.
Project Manager

Enclosures

cc: MassDEP, Northeast Regional Office
Alex Rozycki, P.E., Town of Reading
Ryan Percival, P.E., Town of Reading
Drew MacNichol, Community Development Director, Town of Reading