



NORSE ENVIRONMENTAL SERVICES, INC.
92 Middlesex Road, Unit 4
Tyngsboro, MA 01879
TEL. (978) 649-9932 • FAX (978) 649-7582
Website: www.norseenvironmental.com

September 20, 2023

Reading Conservation Commission
16 Lowell Street
Reading, MA 01867

Re: Small Lane Roadway Extension and Drainage
18 & 22 Small Lane & off Charles Street
Reading, MA 01867
DEP File No. 270-0748

Commissioners

On behalf of my client, Del Rey R.T. this memo addresses the Conservation Commission concerns at the 9-13-23 meeting. Commissioner Dribin requested additional information regarding the construction of a driveway in lieu of a roadway. The lots are zoned as a S-20, please see the zoning requirements below:

Reading Zoning Bylaw S-20:

Zoning District: S-20	
Lot Area	20,000 s.f.
Lot Frontage	120 ft.
Lot width	80 ft.
Front Yard Setback	20 ft
Side Yard Setback	15 ft.
Rear Yard Setback	20 ft.
Maximum lot coverage	25%

The creation of the two single-family house lots are required to meet the above Reading Zoning Bylaw dimensional requirements. The lot has 34 ft. of frontage on Small Lane and does not meet the required 120 ft. of lot frontage. CPDC requires the construction of a roadway to maintain this frontage regardless of the size of the project or number of dwellings.

The project team had a DRT meeting on 8-19-20 to discuss the project and waivers. Please see the attached DRT town meeting notes. Although it is not highlighted in the attached memo, we discussed a driveway alternative in lieu of a roadway. The town representatives discouraged the driveway alternative and cited safety and emergency vehicle concerns. The town representatives encouraged the idea of improving Small Lane by eliminating the hammerhead and constructing a cul-de-sac.

The project team filed a preliminary subdivision plan and met with CPDC on 9-9-20. The applicant requested a reduction in the roadway width from 24 ft. to 22 ft. to reduce impact to the resource areas and buffer zones. Unfortunately, CPDC did not approve this waiver and cited safety and emergency vehicle concerns. Please see enclosed, page 5. highlighted waivers No. 9. of the CPDC Decision of Approval dated 9-14-20.

Unfortunately, the driveway alternative in lieu of the roadway is not an option. The town representatives and CPDC do not support the driveway alternative. As a result, the applicant is required to construct a roadway.

One of the Commissioners requested the BVW performance standards to be addressed. Although this was submitted in the original NOI filing, please see the BVW performance standards below:

310 CMR 10.55: Bordering Vegetated Wetlands

(4) General Performance Standards.

- (a) Where the presumption set forth in 310 CMR 10.55(3) is not overcome, any proposed work in a Bordering Vegetated Wetland shall not destroy or otherwise impair any portion of said area.
- (b) Notwithstanding the provisions of 310 CMR 10.55(4)(a), the issuing authority may issue an Order of Conditions permitting work which results in the loss of up to 5000 square feet of Bordering Vegetated Wetland when said area is replaced in accordance with the following general conditions and any additional, specific conditions the issuing authority deems necessary to ensure that the replacement area will function in a manner similar to the area that will be lost:
 1. the surface of the replacement area to be created ("the replacement area") shall be equal to that of the area that will be lost ("the lost area");

The applicant is providing more than a 2:1 ratio of replacement to lost area. The project proposes to alter 566 s.f. (temp. 210 s.f.) of wetland and provide 1367 s.f. of wetland replication.

2. the ground water and surface elevation of the replacement area shall be approximately equal to that of the lost area;

The groundwater and surface elevation of the replacement area are approximately equal to the lost area.

3. The overall horizontal configuration and location of the replacement area with respect to the bank shall be similar to that of the lost area;

The overall horizontal configuration and location of the replacement area with respect to the bank is similar to the lost area. The applicant is improving the overall site conditions by replacing a 12" culvert and spanning the bank with an open bottom box culvert.

4. the replacement area shall have an unrestricted hydraulic connection to the same water body or waterway associated with the lost area;

The proposed open bottom box culvert shall provide an unrestricted hydraulic connection.

5. the replacement area shall be located within the same general area of the water body or reach of the waterway as the lost area;

The replacement area is located within the same general area of the water body.

6. at least 75% of the surface of the replacement area shall be reestablished with indigenous wetland plant species within two growing seasons, and prior to said vegetative reestablishment any exposed soil in the replacement area shall be temporarily stabilized to prevent erosion in accordance with standard U.S. Soil Conservation Service methods; and

The replacement area shall be at least 75% revegetated with indigenous wetland plants within two growing seasons. Please see the Wetland Replication/Restoration & Bank Restoration Report latest revision date 2-27-23.

7. the replacement area shall be provided in a manner which is consistent with all other General Performance Standards for each resource area in Part III of 310 CMR 10.00.

The replacement area is provided in a manner which is consistent with all the other General Performance Standards for each resource area.

LEC requested the dewatering to be relocated and details provided. The dewatering area is proposed upgradient, near the end of the cul-de-sac, please see Plan Sheet 8 of 8. A dewatering detail is provided on Plan Sheet 6 of 8.

I believe this memo addresses all the Commissioners' concerns stated at the 9-13-23 meeting. Enclosed are (2) copies of this letter, Small Lane Subdivision DRT meeting notes, dated 8-19-20, Preliminary Subdivision Plan, Decision of Approval, dated 9-14-20 and Small Lane Extension, Definitive Subdivision Plan latest revision 9-20-23 prepared by Sullivan Engineering Group, LLC

Sincerely,

Maureen Herald

Maureen Herald, PWS, CWS

Cc: Del Rey R.T.
DEP-NERO
Eric & Beth Hughes
Chuong Tran & Caroline Gracias
Joan Perry