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September 18, 2024

Reading Conservation Commission
16 Lowell Street
Reading, MA 01867

Re: 555 West Street
Reading, MA 01867
DEP File No. 270-0787

Commissioners;

At the August 28, 2024, the Conservation Commission requested the following information:

- Remove leaves, lawn debris, potted plants and trash by hand within the resource area. The applicant is requesting the Commission to condition this in the Order of Conditions.
- Hand remove and manage the invasive species glossy buckthorn (*Rhamnus frangula*). The applicant is requesting the Commission to condition this in the Order of Conditions.
- Remove the burning bush (*Euonymus atropurpureus*) shrub on the southerly side of the dwelling. See the note on plan sheet C-2.
- The erosion controls incorporate a 12” mulch sock and silt fence. See the details on plan sheet C-2.
- The stockpile area shall be surrounded by erosion controls. See the note on plan sheet C-2
- The erosion controls near the shed are adjusted to allow adequate area to remove the shed. See plan sheet C-2
- A silt sac is proposed in the catch basin on West Street. See the details and note on plan sheet C-2.
- Per the Commission request, the infiltration trench is relocated onto the driveway footprint. See the note on plan sheet C-3.
- The driveway is proposed to be repaved within the existing footprint and the material shall be removed offsite on the same day. No stockpiling is allowed. See the note on plan sheet C-2.
- The construction access route is shown on the plan. See the arrows and note on plan sheet C-2.
- Per the Commission’s request, the table on plan sheet C-3 is updated. The existing and proposed deck are modeled as impervious.
- The mitigation area or proposed No Disturb has increased from 5 ft. to 7 ft. along the wetland boundary. The project incorporates 1140 s.f. of mitigation. See plan sheet C-2
- The plantings increased in from (1) tree and (9) shrubs to (1) tree and (14) shrubs, see plan sheet C-3. The plantings shall be spaced (10) ft. apart.
- 310 CMR 10.58(5) Riverfront Redevelopment Standards are addressed on the following page:

310 CMR 10.58(5) Redevelopment Within Previously Developed Riverfront Areas; Restoration and Mitigation. Notwithstanding the provisions of 310 CMR 10.58(4)(c) and (d), the issuing authority may allow work to redevelop a previously developed riverfront area, provided the proposed work improves existing conditions. Redevelopment means replacement, rehabilitation or expansion of existing structures, improvement of existing roads, or reuse of degraded or previously developed areas. A previously developed riverfront area contains areas degraded prior to August 7, 1996, by impervious surfaces from existing structures or pavement, absence of topsoil, junkyards, or abandoned dumping grounds. Work to redevelop previously developed riverfront areas shall conform to the following criteria:

The property is degraded with an existing single-family dwelling, retaining walls, concrete patio, walkways and driveway. The dwelling was constructed in 1956 and predates 310 CMR 10.00 the Massachusetts Wetland Protection Act and Reading Wetland Protection Bylaw and Regulations.

The applicant is proposing to raze a portion of the dwelling, deck, patio, stairs, walkway, retaining wall, shed and gravel play area, to construct an addition, deck, stairs, farmers porch, patio, pervious walkway, repave the driveway, rooftop and driveway infiltration, trim trees, cut (1) dying tree, provide 1140 s.f. of mitigation, manage invasive species, restore the BVW by removing lawn debris, leaves and trash. The mitigation proposed within an area of lawn incorporates native plantings, the area shall naturalize and be protected in perpetuity.

(a) At a minimum, proposed work shall result in an improvement over existing conditions of the capacity of the riverfront area to protect the interests identified in M.G.L. c. 131 § 40. When a lot is previously developed but no portion of the riverfront area is degraded, the requirements of 310 CMR 10.58(4) shall be met.

The project shall improve the existing conditions by providing 1140 s.f. of mitigation, manage invasive species, restore the BVW by removing lawn debris, leaves, trash, replace the concrete walkway and patio with pervious pavers and provide rooftop and driveway infiltration. Erosion controls shall be set and maintained for the duration of the project.

(b) Stormwater management is provided according to standards established by the Department.

The single-family dwelling is exempt from Stormwater Management Standards however, the project proposes rooftop and driveway infiltration.

(c) Within 200-foot riverfront areas, proposed work shall not be located closer to the river than existing conditions or 100 feet, whichever is less, or not closer than existing conditions within 25-foot riverfront areas, except in accordance with 310 CMR 10.58(5)(f) or (g).

The proposed work is NOT closer than the existing conditions. The project proposes mitigation or native plantings along the Bordering Vegetated Wetland.

(d) Proposed work, including expansion of existing structures, shall be located outside the riverfront area or toward the riverfront area boundary and away from the river, except in accordance with 310 CMR 10.58(5)(f) or (g).

The proposed addition, deck and walkway are NOT proposed closer than existing conditions. The applicant is improving the riverfront area by managing the invasive species, incorporating mitigation or native plantings, restoring the BVW by removing lawn debris, leaves, trash, incorporating pervious pavers, rooftop and driveway infiltration. Erosion controls shall be set and maintained for the duration of the project.

(e) The area of proposed work shall not exceed the amount of degraded area, provided that the proposed work may alter up to 10% if the degraded area is less than 10% of the riverfront area, except in accordance with 310 CMR 10.58(5)(f) or (g).

The total lot area is 15,470 s.f. and the existing impervious area is 2855 s.f. or 18.5% of the Riverfront Area. The project proposes an additional 441 s.f. of impervious area, see the table on plan sheet page C-3.

The work within the 200 ft. Riverfront Area is proposed within an area of lawn, includes the following:

Propose work in area of lawn	s.f. of alteration
Addition	51
Deck	316
Front Porch	106
Pervious Pavers	48
Total	521 s.f.

(f) When an applicant proposes restoration on-site of degraded riverfront area, alteration may be allowed notwithstanding the criteria of 310 CMR 10.58(5)(c), (d), and (e) at a ratio in square feet of at least 1:1 of restored area to area of alteration not conforming to the criteria. Areas immediately along the river shall be selected for restoration. Alteration not conforming to the criteria shall begin at the riverfront area boundary. Restoration shall include:

1. removal of all debris, but retaining any trees or other mature vegetation;
2. grading to a topography which reduces runoff and increases infiltration;
3. coverage by topsoil at a depth consistent with natural conditions at the site; and
4. seeding and planting with an erosion control seed mixture, followed by plantings of herbaceous and woody species appropriate to the site;

(g) When an applicant proposes mitigation either on-site or in the riverfront area within the same general area of the river basin, alteration may be allowed notwithstanding the criteria of 310 CMR 10.58(5)(c), (d), or (e) at a ratio in square feet of at least 2:1 of mitigation area to area of alteration not conforming to the criteria or an equivalent level of environmental protection where square footage is not a relevant measure. Alteration not conforming to the criteria shall begin at the riverfront area boundary. Mitigation may include off-site restoration of riverfront areas, conservation restrictions under M.G.L. c. 184, §§ 31 through 33 to preserve undisturbed riverfront areas that could be otherwise altered under 310 CMR 10.00, the purchase of development rights within the riverfront area, the restoration of bordering vegetated wetland,

projects to remedy an existing adverse impact on the interests identified in M.G.L. c. 131, § 40 for which the applicant is not legally responsible, or similar activities undertaken voluntarily by the applicant which will support a determination by the issuing authority of no significant adverse impact. Preference shall be given to potential mitigation projects, if any, identified in a River Basin Plan approved by the Secretary of the Executive Office of Energy and Environmental Affairs.

The project does not comply with 310 CMR 10.58(e) as it proposes 521 s.f. of new work within an area of lawn. The project is proposed within the inner riparian zone and complies with 310 CMR 10.58(5)(g) which requires 2:1 mitigation or 1042 s.f. The project provides greater than 2:1 mitigation or 1140 s.f. The mitigation includes eliminating the maintained lawn, incorporating native plants that shall be protected in perpetuity. In addition, the project proposes to manage the invasive species, glossy buckthorn, incorporating pervious pavers, restoring the BVW by removing lawn debris, leaves, trash and incorporating roof top and driveway infiltration.

Enclosed are (2) copies of this letter and the Proposed Site Plan, prepared by Boston Civil, latest revision 9-17-24. If you have any questions or concerns regarding the above information, please do not hesitate to contact me.

Sincerely,

Maureen Herald

Maureen Herald, PWS, CWS

Cc: DEP-NERO: Mr. Tyler Ferrick
Mr. Kaushal Patel