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Refer to File No. REA-0440

May 14, 2025

Reading Conservation Commission  
Town Hall  
16 Lowell St.  
Reading, MA 01867

RE: NOI Supplemental Information  
# 57 Longwood Rd, Reading  
Applicant: Patrick Trojer  
DEP File# 209-0686

Dear Members,

Hayes Engineering, Inc. is submitting the following supplemental information pursuant to comments received at the public hearing on November 13, 2024.

Revised Plan

Attached are two (2) copies of the "Plan to Accompany Notice of Intent" Sheet 2 of 2 revised through May 14, 2025 for review. Revisions are detailed below.

1. Added a table titled "Impervious Area Table".
2. Added 2 dry wells for addition roof runoff,
3. Reconfigured the siltsock location such that it won't be in front of the driveway.
4. Added a note indicating that the area of driveway expansion should be paved with binder during the initial stage of construction.
5. Added location of temporary soil pile and staging area within the lawn area on the right side of the driveway and added associated label.
6. Added Mitigation Shrub Planting Area within the lawn area left of the driveway and added associated label.
7. Revised "Proposed Walkway" label to indicate the walkway material is pervious pavers (Turfstone).
8. Extended existing Turfstone pervious paver walkway to driveway ( north side of house).
9. Added note regarding provision of drywell/roof runoff control device/soil testing for infiltration device sizing.
10. Added note regarding cherry tree relocation.
11. Added note regarding installation of driveway expansion binder and proposed wall in the initial stage of construction.
12. Added a revision date of May 14, 2025

Impervious Area Calculation (within Portion of Property Within Riverfront Area)

The Commission requested a comparison of present and proposed amounts of impervious areas that are contained within the property's extent of riverfront area resource area (RFA). As shown on the table provided on the revised Notice of Intent plan, existing impervious area

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("degraded area") is 1,355 s.f. and proposed impervious area will be 1,921 s.f., indicating there will be an increase of 566 s.f. of impervious area resulting from the project as currently designed.

Attached for added visualization of this are two 11" x 17 color plans dated February 24, 2025 showing extents and amounts of existing and proposed riverfront area disturbances.

#### Parking During Construction

The owners will park on the street during construction.

#### Location of Erosion Controls

Erosion control location along bottom of driveway has been adjusted to curve along edge of existing and proposed stone wall.

#### Compliance with Wetlands Protection Act Regulations Redevelopment Standards

Performance standards for "Redevelopment Within Previously Developed Riverfront Areas", established in the Department of Environmental Protection's "1997 Amendments to the Wetlands Protection Act", 310 CMR 10.58(5), require that certain criteria be met. The performance standards, and how the project proposes to meet them, are summarized below.

- 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, s.40. When a lot is previously developed, but no portion of the riverfront area is degraded, the requirements of 310 CMR 10.58(5) shall be met".*

Riverfront area improvement consists of installation of a stormwater treatment system as part of the project. This is an improvement upon existing conditions wherein pollutants from vehicles are currently being washed off the pavement into the river or being infiltrated directly into the ground without treatment.

- b. *"Stormwater Management is provided according to standards established by the Department."*

This is project associated with a single-family house and DEP stormwater management standards do not apply in accordance with 310 CMR 10.05(6)(l). However, stormwater treatment measures are required in accordance with Section 3 (N) and (O) of the Reading Wetlands Bylaw Regulations. As such, the project will include stormwater treatment measures consisting of infiltration of dry wells for infiltration of roof runoff and an area of crushed stone at the entry of the expanded driveway. Erosion control procedures will be implemented as part of the project.

- 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 area, except in accordance with 310 CMR 20.58 (5)(f) or (g)."*

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The entirety of the riverfront area (RA) on this property, extending from the front edge of the house to the paved layout of the street and within the outer RA (100-200'), is in a previously disturbed (filled) and degraded (impervious) existing condition. While the project proposes expansion of the house toward the street and extends and expands the width of the driveway, that work is totally contained within the existing extent of previously disturbed and degraded conditions without being located closer to the river than existing conditions. Note that the language in this performance standard refers generally to existing conditions and does not distinguish between those areas that are previously disturbed but not degraded (e.g. lawn) and those areas that are degraded (e.g. pavement). The existence of the paved street and house across the street constrains the location of the proposed work to existing conditions on the property itself and outside the 100-foot RA. As such, the project meets this performance standard.

- d. *“Proposed work, including expansion of existing structures, shall be located outside of the riverfront area or toward the riverfront boundary and away from the river, except in accordance with 310 CMR 20.58 (5)(f) or (g).”*

The current garage addition placement is already located toward the RA boundary (outside of the 100-foot RA) and is in fact separated from the river by a street and single family house. The current placement of the garage addition also takes advantage of the availability of the existing driveway for garage access.

The garage addition structure could be relocated westerly to the rear of the house where it would be entirely outside of the RA; however, constraints of zoning setbacks, existing grades, and narrow passage along the side of the house restrict the ability to construct a vehicular access to the garage. Additionally, the relocation of the addition to the westerly side of the house would place it on the side of the house containing the kitchen and dining areas rather than the front bedrooms intended to be added or expanded. Thus, relocation of the addition outside of the RA would not meet the project goals of access to expanded garage space and bedroom renovation.

- e. *“The area of proposed work shall not exceed the amount of degraded area, provided that the proposed work may alter up to 10% of the riverfront area if the degraded area is less than 10% of the riverfront area, except in accordance with 310 CMR 20.58 (5)(f) or (g).”*

The area of proposed work exceeds the amount of degraded area within the RA, so the Applicant is proposing mitigation in accordance with 310 CMR 10.58(g.).

- f. *When an applicant proposes restoration of 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;*

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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;*

The Applicant is proposing mitigation in accordance with 310 CMR 10.58(g).

- 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.*

The Applicant proposes this project in accordance with the requirements of 310 CMR 10.58(5)(g).

We trust that the information contained herein adequately addresses all concerns and look forward to reviewing the information with the Commission at their next hearing.

Feel free to contact me at (781)246-2800 or by email ( [lwallis@hayeseng.com](mailto:lwallis@hayeseng.com) ) with any questions or comments you may have regarding the contents of this letter.

Very Truly Yours,



Elizabeth Wallis, P.W.S.  
Professional Wetland Scientist

CC: Patrick Trojer (via email)