

Horsley Witten Group

Sustainable Environmental Solutions

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February 10, 2020

Mr. Chuck Tirone
Conservation Administrator
Town of Reading
16 Lowell Street
Reading, MA 01867-2683

Re: Fourth Peer Review of Notice of Intent – 135, 139, 149R Howard Street, Reading, MA
MassDEP File No. 270-0714

Dear Mr. Tirone:

The Horsley Witten Group, Inc. (HW) is pleased to provide the Town of Reading Conservation Commission with this letter report summarizing our fourth review of the Notice of Intent, Drainage Report, and plans for developing the site at 135, 139 & 149R Howard Street, Reading, Massachusetts. The plans were prepared for Infrastructure Holdings, LLC (Applicant) by Civil Design Consultants, Inc. The project consists of the demolition of two single family residential houses and the construction of a six-lot residential subdivision with a 346-foot roadway, including landscaping, utility installation, and stormwater management. The 4.1-acre project site includes 0.53 acres of bordering vegetated wetlands (BVW) on the northern end of the site and a 1,805 square feet isolated vegetated wetland (IVW) within the northeast corner of the parcel. The proposed work is within the 100-foot buffer zone of the BVW and the IVW. The proposed new development maintains a 25-foot zone of natural vegetation from the BVW and the IVW.

The following additional documents for 135, 139 & 149R Howard Street were received by HW:

- Letter to Town of Reading Conservation Administrator, referencing Infrastructure Holdings, LLC, 35, 139, 149R Howard Street, Reading, MA, prepared by Abutters to Proposed Development, dated January 6, 2020;
- Letter to Town of Reading Conservation Commission, referencing the Notice of Intent DEP File #270-0714, prepared by Civil Design Consultants, Inc., dated January 28, 2020;
- Letter to Town of Reading Community Planning and Development Commission, referencing the Definitive Subdivision, prepared by Civil Design Consultants, Inc., dated January 28, 2020;
- Letter to Town of Reading Community Planning and Development Commission, referencing the Request for Waivers, prepared by Civil Design Consultants, Inc., dated January 28, 2020;
- Drainage Report, prepared for Infrastructure Holdings LLC, prepared by Civil Design Consultants, Inc., dated December 21, 2018, revised January 15, 2020; and

- Definitive Subdivision Plans for 135, 139 & 149R Howard Street, Reading, Massachusetts, prepared by Civil Design Consultants, Inc., dated December 21, 2018, revised thru January 27, 2020, which includes:
 - Cover Sheet C-1
 - Existing Condition Plan C-2
 - Plan of Land C-2A
 - Subdivision Plan C-3
 - Roadway Plan & Centerline Profile C-4
 - Grading, Drainage & Landscaping C-5
 - Erosion Control Plan C-6
 - Tree Removal Plan C-7
 - Construction Details D-1
 - Construction Details D-2
 - Construction Details D-3
 - Construction Details D-4

Wetlands Review repeated from December 2, 2019 peer review letter:

Isolated Fresh Water Wetland

The Applicant has submitted revised plans showing the limits of the isolated vegetated Wetland in the northeastern portion of the site. This wetland area is approximately 1,800 SF and is therefore jurisdictional under the Reading General Bylaw – Section 7.1 and associated Wetlands Protection Regulations (November 2012) as a Fresh Water Wetland.

- **HW recommends that the Commission include within in its Findings that both a Bordering Vegetated Wetland (BVW) and an isolated Fresh Water Wetland are located at this site.**

Buffer Zone Protection

Under the local Regulations, all freshwater wetlands at this site are afforded a 25-foot Zone of Natural Vegetation (ZNR) as well as a 10-foot additional (35-foot total) foundation buffer. We note that the revised project footprint honors the 25-foot ZNR.

- **HW recommends that the Commission include as a Condition in any Order of Conditions (OOC) it may issue, a provision requiring permanent markers be installed and maintained as required under Section 3D(6) of the Regulations, and that the Applicant shall coordinate with the Commission or its Agent the type of markers appropriate for the site.**

In several locations, grading occurs within the 35-foot buffer, and it appears that a small portion of the driveway for Lot 4, including a corner of a retaining wall, intrudes within the 35-foot buffer to the isolated wetland area. (See additional comments below).

- **HW will defer to the Commission's discretion, whether or not this intrusion is in keeping with the provisions of the local Bylaw and Regulations or whether it may be appropriate to reconfigure this lot to allow for full compliance with the regulations.**

Stormwater Review

After reviewing the additional documents listed above, HW offers the following comments concerning the stormwater management design per the standards of the Massachusetts Wetlands Protection Act (310 CMR 10.00), the Massachusetts Stormwater Handbook (MSH) dated February 2008, the Town of Reading Wetlands Protection Regulations dated November 2012, and the Town of Reading Subdivision Regulations.

Comments below correlate to our May 29, 2019 and our December 2, 2019 peer review letters, additional comments are provided in **bold italic font**.

1. *Standard 1 states that no new stormwater conveyances (e.g. outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth.*
 - a. May 29, 2019: The proposed stormwater management design consists of directing the runoff from the houses, driveways, and roadway via swales and culverts into a forebay and then into an infiltration basin. The outlet control structure discharges towards the BVW via an 8-inch HDPE pipe. The flow from the 8-inch pipe has been calculated as 1.1 cubic feet per second (cfs) during the 100-year storm event. The Applicant has added a riprap apron at the discharge point which is greater than 35 feet from the BVW. It does not appear that the proposed discharge will cause erosion in the wetlands.

December 2, 2019: The Applicant has redesigned the stormwater management for the subdivision to include individual drywells to manage the runoff from each of the six proposed roof tops. Two small infiltration basins to manage the stormwater flowing from the proposed roadway towards the municipal system on Howard Street. One infiltration basin (Infiltration Basin 1) will manage the stormwater flowing onto the site from the west and portions of proposed lots 1 and 2. One infiltration basin (Infiltration Basin 2) will manage the stormwater from the proposed roadway and five of the six proposed driveways. The driveway to Lot 4 will be managed with an infiltration trench. Infiltration Basins 1 and 2 discharge to the BVW, properly sized riprap aprons have been proposed at the outlets.

It does not appear that the proposed discharge will cause erosion in the wetlands.

February 10, 2020: At the request of the Town Engineer the Applicant has redesigned the stormwater management system in the proposed roadway to include five (5) deep sump catch basins. Infiltration Basin 1, Infiltration Basin 2, the Infiltration Trench in lot 4, and the six (6) individual drywells will manage the runoff as stated previously. Infiltration Basin 1 and 2 outlet towards the BVW,

riprap aprons has been proposed to reduce the velocity and minimize erosion at Flared End Section 4.

It does not appear that the proposed discharge will cause erosion in the wetlands.

- b. May 29, 2019: The existing contour elevations along the northern property boundary are not clearly labeled and it is difficult to verify that the proposed contours tie into the existing contours properly. Furthermore, the outlet from the infiltration basin, flared end section (FES) 5 has an invert of 158.2 which may be lower than the existing grade at this point. HW recommends that the Applicant clarify the contours and verify that the existing contours near FES-5 will direct runoff west towards the BVW and not north towards the abutting parcels.

December 2, 2019: The Applicant has revised the proposed stormwater management in the northern portion of the parcel. FES 2 is proposed to discharge towards the BVW greater than 35 feet from WFA10 at elevation 160.50. FES 4 is proposed to discharge approximately 30 feet from WFA7 at elevation 160.0. Both outlet elevations appear to be set at existing surface elevations.

Infiltration Basin 2 includes an overflow weir discharging north towards the IVW set at elevation 162.0, the HydroCAD modeling analysis indicates that the peak elevation of Infiltration Basin 2 during a 100-year storm event will be 161.84, therefore the basin should not typically overflow towards the IVW.

The outlet control structure in Infiltration Basin 2 directed west towards the BVW includes a 4-inch orifice set 1 foot higher than the bottom of the basin.

The Applicant appears to comply with Standard 1.

2. *Standard 2 requires that Stormwater management systems shall be designed so that post-development peak discharge rates do not exceed pre-development peak discharge rates.*
 - a. May 29, 2019: The Applicant has provided HydroCAD results for the 2-, 10-, 25-, and 100-year events which indicate that the proposed conditions peak discharge rates will not exceed the pre-development rates at all design points leaving the property. The volume of runoff to the BVW increases for the 100-year event. The values utilized for area, curve numbers and times of concentration appear reasonable for pre-development and post-development conditions.

December 2, 2019: The revised HydroCAD modeling analysis indicates that the flow rate and volume will be reduced or will remain the same under post development conditions for Design Point 1, 2 and 3. No further comment is required.

- b. May 29, 2019: In accordance with Section O of the Reading Wetlands Protection Regulations and Section 7.4.4.1.d. of the Reading Subdivision Regulations the peak rates and volumes of stormwater runoff should not increase. The HydroCAD model indicates that the volume towards Design Point 1, the BVW, will increase from 0.174

acre-feet to 0.201 acre-feet under proposed conditions. HW recommends that the Applicant revisit the design to eliminate the increased volume.

December 2, 2019: The Applicant has revised the stormwater design to maintain or reduce the flow rates and volumes at the three design points for the various storm events. The flow and volumes for the 100-year event are illustrated in the table below.

	Pre-dev flow 100-yr event	Post-dev flow 100-yr event	Pre-dev vol 100-yr event	Post-dev vol 100-yr event
Design Pt 1	1.2 cfs	1.1 cfs	0.202 ac-ft	0.157 ac-ft
Design Pt 2	0.1 cfs	0.1 cfs	0.029 ac-ft	0.021 ac-ft
Design Pt 3	0.2 cfs	0.2 cfs	0.024 ac-ft	0.009 ac-ft

February 10, 2020: The Applicant has revised the stormwater design as requested by the Town Engineer. The flow and volumes for the 100-year event are illustrated in the table below. The calculations indicate that the discharge rate and volume will be remain the same or be reduced slightly under post-development conditions.

	<i>Pre-dev flow 100-yr event</i>	<i>Post-dev flow 100-yr event</i>	<i>Pre-dev vol 100-yr event</i>	<i>Post-dev vol 100-yr event</i>
<i>Design Pt 1</i>	<i>1.2 cfs</i>	<i>1.1 cfs</i>	<i>0.202 ac-ft</i>	<i>0.163 ac-ft</i>
<i>Design Pt 2</i>	<i>0.1 cfs</i>	<i>0.1 cfs</i>	<i>0.029 ac-ft</i>	<i>0.021 ac-ft</i>
<i>Design Pt 3</i>	<i>0.2 cfs</i>	<i>0.1 cfs</i>	<i>0.024 ac-ft</i>	<i>0.017 ac-ft</i>

- c. May 29, 2019: Section 7.4.4.2 of the Reading Subdivision Regulations requires specific standards to be used in designing a stormwater basin including maintenance of side slopes with a ratio less than 4:1, provision of a low flow channel, provision of a trash rack, and maintaining a minimum distance of 10 feet to any property line. HW recommends that the Applicant verify it is complying with the Town of Regulations Storm Drainage requirements.

December 2, 2019: The Applicant has incorporated the specific requirements in accordance with Section 7.4.4.2 of the Reading Subdivision Regulations. No further comment is required.

- d. May 29, 2019: The Applicant has modeled the proposed development including the roof runoff from the 6 houses. It is not clear how the Applicant will direct the runoff from the houses towards the proposed roadway and swales. Individual subsurface chambers or rain gardens designed to capture the roof runoff is a preferred design that disconnects

the clean roof runoff from the roadway runoff. HW recommends that the Applicant clarify how the roof runoff will be managed.

December 2, 2019: The Applicant has proposed individual Cultec Recharge Chambers for each of the six proposed houses. The size of the chambers appears adequate to manage all storm events analyzed. HW recommends that the Applicant verify that the surface elevations for Lots 4 and 6 meet the minimum cover required per the detail on Sheet D-2.

February 10, 2020: The Applicant adjusted the drywells as recommended. No further comment.

- e. May 29, 2019: The contours on the Existing Watershed Plan dated December 5, 2018 are slightly different from those on the Existing Conditions Plan dated December 21, 2018. In the vicinity of WFA 5 at the end of the stonewall the revised contours alter the subcatchment divide slightly. HW recommends that the Applicant clarify the discrepancy.

December 2, 2019: The Applicant has revised the Existing Watershed Plan as requested. No further comment is required.

- f. May 29, 2019: HW recommends that the Applicant provided additional spot grades between Howard Street and the Proposed House on Lot 1 to ensure that the proposed catchment area is accurate.

December 2, 2019: The Applicant has added the requested spot grades. No further comment is required.

- g. May 29, 2019: The Applicant has noted that swales will be placed behind the houses on Lots 2 and 3. The swales appear relatively close to the houses and may create ponding in the rear of these parcels. HW recommends that the Applicant revisit the design and the proposed contours.

December 2, 2019: The Applicant has clarified the swales behind proposed Lots 2 and 3. No further comment is required.

- h. May 29, 2019: The proposed grades of Lot 1 and Lot 2 have the potential of sending stormwater towards the existing property at 149 Howard Street. HW recommends that the Applicant provide clear direction for the future contractor's use in grading these properties in a manner such that the runoff will not flow towards 149 Howard Street. Future homeowners should be made aware that any swales installed in the rear of their properties are not to be altered.

December 2, 2019: The Applicant has clarified the swales behind proposed Lots 1, 2, and 3. The Commission may wish to include a Special Condition that states that the homeowners will not be allowed to alter these swales without approval from the Commission.

February 10, 2020: The Commission may wish to include a Special Condition that states that the homeowners will not be allowed to alter the swales without approval from the Commission.

3. *Standard 3 requires that the annual recharge from the post-development site shall approximate the annual recharge from pre-development conditions based on soil type.*
- a. May 29, 2019: The Applicant has provided the required test pits and calculations to verify compliance with Standard 3. The proposed infiltration basin will have the required 2 feet of separation from the estimated seasonal high ground water (ESHGW), a mounding analysis was provided to verify the storage within the basin will not be impacted, and the basin will draw down as required within 72 hours. Groundwater appears to be high throughout the property, though the test pits indicate that the two feet of separation can be provided it may be beneficial to install a monitoring well in the area of the basin to confirm the depth to groundwater prior to construction.

December 2, 2019: As stated previously the Applicant has provided documentation in compliance with Standard 3. It has been noted during the site visit and during the public hearing that layers of silty clay have been identified throughout the area. HW recommends that the Commission include a Special Condition requiring the Applicant to over excavate the existing soil beneath each of the infiltration practices (basins, drywells, and trench) to below the estimated seasonal high ground water table and replace it with soil with an exfiltration rate of 2.41 inches per hour or greater.

February 10, 2020: HW recommends that the Commission include a Special Condition requiring the Applicant to over excavate the existing soil beneath each of the infiltration practices (basins, drywells, and trench) to below the estimated seasonal high ground water table and replace it with soil with an exfiltration rate of 2.41 inches per hour or greater.

- b. May 29, 2019: HW recommends that the Applicant provide an additional mounding analysis to verify that the stormwater infiltrating into the basin will not raise the groundwater elevation directly north or east of the infiltration basin.

December 2, 2019: The Applicant has provided the revised mounding analysis for Infiltration Basins 2, 3, and 4. The calculations indicate that the groundwater will not rise into the basins reducing the amount of available storage. HW recommends a further analysis be included to verify that the groundwater from Infiltration Basin 2 will not raise the elevation of the water table within the IVW to the north of Infiltration Basin 2 and more specifically verify that any groundwater mounding that may occur on the site will not impact the closest abutting house.

To determine the initial saturated thickness beneath the infiltration basins the Applicant utilized an irrigation well dug a few houses away. A more realistic approach would be to use the deepest hole dug on the property where the infiltration basins will be placed. The test hole data provided to HW list the deepest hole to be 96 inches from the surface with an ESHGW at 30 inches. The initial saturated thickness would be 5.5 feet.

The specific yield utilized in the mounding analysis was listed as fine sand with a specific yield of 0.23. The layers of silt clay that were observed suggests that this value is slightly high and a value of 0.08 or 0.15 may be more appropriate.

February 10, 2020: The Applicant has revised the mounding analysis utilizing the values previously recommend by HW. The mounding analysis indicates that the ground water will not mound into the basin and will not mound above existing elevations 50 feet from the center of the proposed basin.

4. *Standard 4 requires that the stormwater system be designed to remove 80% Total Suspended Solids (TSS) and to treat 0.5-inch of volume from the impervious area for water quality.*

- a. May 29, 2019: The Applicant has documented a TSS removal percentage of greater than 80% for the proposed treatment train, which includes street sweeping. Volume 2, Chapter 1, page 9 of the Massachusetts Stormwater Handbook describes the various methods for street sweeping and the percentage of TSS removal allowed depending on the method to be used. HW recommends that the Applicant confirm that the Town of Reading will be conducting street sweeping in accordance with Table SS1 or remove the 5% credit for street sweeping.

December 2, 2019: The Applicant has revised the TSS removal calculations and has provided the required 80% TSS removal. No further comment is required.

- b. May 29, 2019: The Applicant has provided a calculation to address the water quality volume requirement of Standard 4. The proposed infiltration basin provides the required water quality volume and the forebay provides the required pretreatment.

December 2, 2019: No further comment is required.

The Applicant complies with Standard 4.

5. *Standard 5 is related to projects with a Land Use of Higher Potential Pollutant Loads (LUHPPL).*

May 29, 2019: Residential subdivisions are not considered LUHPPLs therefore Standard 5 is not applicable to this project.

December 2, 2019: No further comment is required.

6. *Standard 6 is related to projects with stormwater discharging into a critical area, a Zone II or an Interim Wellhead Protection Area of a public water supply.*

May 29, 2019: The proposed development is not located within a critical area. Therefore Standard 6 is not applicable.

December 2, 2019: No further comment is required.

7. *Standard 7 is related to projects that are considered redevelopment.*

May 29, 2019: The 6-lot subdivision is significantly increasing the impervious area. Therefore, the site is considered new development and Standard 7 is not applicable.

December 2, 2019: No further comment is required.

8. *Standard 8 requires a plan to control construction related impacts including erosion, sedimentation or other pollutant sources during construction shall be developed and implemented.*
- a. May 29, 2019: The Applicant has provided an erosion control barrier along the down gradient boundary of the limit of disturbance and has also provided erosion control notes and details on Sheet D-1. HW recommends that the Applicant include a tree protection detail and reference Section L of the Reading Wetlands Protection Regulations.

December 2, 2019: The Applicant has provided a separate Erosion Control Plan (Sheet C-6) and has provided the requested tree protection detail on Sheet D-1. No further comment is required.

- b. May 29, 2019: HW recommends that potential locations for soil stockpiles be located on the plans with a note stating that soil stockpiles shall be located outside the 100-foot buffer zone to ensure proper protection of the adjacent wetland resource areas. The proposed stockpiles will also require additional erosion control protection.

December 2, 2019: The Applicant has provided the requested stockpile area on Sheet C-6. No further comment is required.

- c. May 29, 2019: HW recommends that the Applicant indicate where the construction entrance will be located on the plans.

December 2, 2019: The Applicant has located the construction entrance on Sheet C-6 as requested. The construction entrance detail is located on Sheet D-1. No further comment is required.

9. *Standard 9 requires long-term operation and maintenance plan shall be developed and implemented to ensure that stormwater management systems function as designed.*

- a. May 29, 2019: The Applicant has provided an Operation and Maintenance Plan (O&M Plan) dated December 4, 2018, within the Drainage Report.

December 2, 2019: The Applicant has revised the O&M Plan to reflect the revised stormwater management design. No further comment is required.

- b. May 29, 2019: HW recommends that a simple sketch be included with the O&M Plan, the Grading & Drainage Plan noted has too many other notations. The sketch should be easy to read with clear labels of the infiltration basin, the forebay, and the swales that need to be maintained to function properly.

December 2, 2019: The Applicant has provided a simple sketch of the infiltration basins.

- c. May 29, 2019: HW recommends that the Applicant clarify if the stormwater system will be maintained by the Town of Reading or a homeowner's association.

December 2, 2019: The Applicant has indicated that the Town will maintain the roadway drainage system which includes Infiltration Basins 2, 3, and 4.

February 10, 2020: HW recommends that the Reading Department of Public Works reviews and accepts the Operation & Maintenance Plan proposed by the Applicant.

10. Standard 10 requires that an Illicit Discharge Compliance Statement is provided.

- a. May 29, 2019: An Illicit Discharge Statement signed by the property owner must be provided to the Reading Conservation Commission prior to construction.

December 2, 2019: HW recommends that the Conservation Commission include a Special Condition requiring a signed Illicit Discharge Statement prior to land disturbance.

February 10, 2020: HW recommends that the Conservation Commission include a Special Condition requiring a signed Illicit Discharge Statement prior to land disturbance.

11. Additional Comments:

- a. May 29, 2019: During the site visit a number of large trees were observed that will be removed to construct the infiltration basin. It is not obvious from the plan set the number or size of trees that will be removed. The Reading Conservation Commission may find that replacement trees within the 100-foot buffer zone would be beneficial to protect the resource area as well as the wildlife habitat.

December 2, 2019: The Applicant has included a Tree Removal Plan (Sheet C-7). The plan indicates that 25 trees are proposed to be removed within the 100-foot buffer zone and 28 trees are proposed to be planted. HW defers to the Conservation Commission the acceptance of the tree removal and tree replacement.

February 10, 2020: The Applicant has revised Sheet C-7. The plan indicates that 24 trees are proposed to be removed and 25 are proposed to be planted within the 100-foot buffer zone. The final planting location shall be coordinated with the Tree Warden and Conservation Commission. It appears that 22 street trees will also be planted within the right of way. HW defers to the Conservation Commission the acceptance of the tree removal and tree replacement.

- b. May 29, 2019: During the site visit an IVW was located along the eastern property boundary possibly in the vicinity of the infiltration basin. The Applicant may need to revise the basin layout to provide the required natural vegetation buffer to this locally jurisdictional resource area. HW recommends that the Applicant locate the IVW on the plan and provide the required buffers.

December 2, 2019: The Applicant has located the IVW on the plan set and has maintained the 25-foot no disturb zone. It appears that the Applicant will be grading within 35 feet of the IVW as well as the BVW. Furthermore, it appears that a 2-foot-high retaining wall associated with the driveway for Lot 4 will be located

between 25 and 35 feet from the edge of the IVW. HW defers to the Conservation Commission the acceptance of the proposed grading and proposed retaining wall.

- c. May 29, 2019: HW recommends that the Applicant provide additional low impact design (LID) features and manage the stormwater on each individual lot rather than providing one large infiltration basin at the downgradient property boundary. As noted previously disconnecting the roof runoff is a preferred design alternative.

December 2, 2019: The Applicant has proposed individual drywells for the roof runoff of the six proposed houses. Furthermore, the Applicant has proposed four infiltration basins and an infiltration trench to manage the stormwater runoff closer to its source. No further comment is required.

- d. May 29, 2019: HW also conducted a brief review of available historic USGS maps to see if this provided any insight regarding the site hydrology as suggested in the letter by one of the abutters (letter by Charles Castelluccio dated February 26, 2019). Unfortunately, these maps (Historic USGS Maps of New England & NY available from the University of New Hampshire Library, Government Information Unit; <http://docs.unh.edu/towns/MassachusettsTownList.htm>) do not provide definitive evidence of a wetland or stream channel in this general area.

December 2, 2019: As discussed during the public hearing HW had recommended that the Applicant verify that the runoff that may be flowing through the existing site from Howard Street is controlled in some manner. The Applicant has provided Infiltration Basin 1 and swales to manage runoff crossing the parcel. No further comment is required.

- e. **December 2, 2019: HW recommends that the Conservation Commission include Special Conditions in any Order that may be issued for this project to require that any potential homeowners are aware of the issued Order of Conditions and any impact it may have on their properties.**
- f. **December 2, 2019: HW recommends that the Conservation Commission include a Special Condition requiring the installation of monuments at the 25-foot no disturb zone associated with the BVW and the isolated Fresh Water Wetland.**
- g. **December 2, 2019: HW recommends that the Conservation Commission include a Special Condition requiring that the installation of all infiltration practices be witnessed by a professional engineer and that document is provided to the Commission stating that the systems were installed per the design plans and Order of Conditions.**
- h. ***The Abutters have raised a concern regarding the direction of groundwater flow. The mounding analysis indicates that the groundwater elevation should not be altered 50 feet from the infiltration basin. The property line is approximately 75 feet away. During the November Conservation Commission hearing there was discussion of installing an underdrain beneath Infiltration System 2 to direct the***

infiltrated stormwater towards the BVW. HW recommends that the Applicant provide an underdrain within Infiltration Basin 2 to direct the infiltrated stormwater towards the BVW to ease the abutters concerns.

- i. The Abutters have provided a letter to the Commission dated January 6, 2020. Several of the issues listed, but not all, have been addressed by the Applicant in response to HW and the Town Engineer. HW recommends that the Applicant respond to the Abutters concerns in writing.***

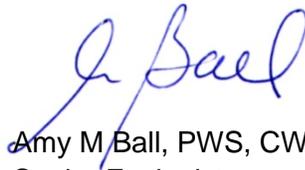
We appreciate the opportunity to assist the Reading Conservation Commission on this project review. Please contact Janet Bernardo at 857-263-8193 or at jbernado@horsleywitten.com if you have any questions regarding these comments.

Sincerely,

Horsley Witten Group, Inc.



Janet Carter Bernardo, P.E.
Senior Project Manager



Amy M. Ball, PWS, CWS
Senior Ecologist