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August 2, 2021

Neal Duffy  
Regional Coordinator, Green Communities  
Massachusetts Department of Energy Resources  
205B Lowell Street  
Wilmington, MA 01887

**Re: *Town of Reading Preliminary Review, Criteria 1 and 2***

Dear Mr. Duffy:

The Town of Reading requests a review of its Zoning Bylaw to determine whether the Town satisfies Criteria 1 and 2 of the Green Communities Program, G. L. c. 25A, § 10. As described below, I believe that the Zoning Bylaw, as currently drafted, meets these requirements. For your convenience, relevant excerpts of the Zoning Bylaw are attached.

**Criterion 1: Provide as-of-right siting in designated locations for renewable/alternative energy generation, research & development, or manufacturing facilities**

The Town's Business B, Business C, and Industrial districts and Planned Unit Development-Business (PUD-B) and Planned Unit Development-Industrial (PUD-I) overlay districts allow the as-of-right siting of renewable or alternative energy research and development facilities. See § 5.3, Table of Uses. Renewable or alternative energy light manufacturing and manufacturing facilities are allowed as-of-right in the Industrial district and PUD-I overlay district. Id.

Research and Development/Manufacturing

“Research and Development Facility” is defined as “[a] laboratory or similar facility used for the primary purpose of research, investigation, experimentation, and testing activities related to the fields of electronics, engineering, geology, physics, or other scientific area, but excluding life science facilities.” § 2.0 of the Zoning Bylaw. There is no further limitation on the specific type of research and development facility, and therefore facilities for industries or products associated with renewable or alternative energy are permitted.<sup>1</sup> As mentioned above, these facilities are permitted

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<sup>1</sup> Life science facilities, which are excluded, are facilities “devoted to advanced and applied sciences that expand the understanding of human physiology . . .” § 2.0 of the Zoning Bylaw.

as-of-right in the Business B, Business C, and Industrial districts and the PUD-B and PUD-I overlay districts.

“Light Manufacturing” is defined as “the processing, fabrication, production or assembly of materials or products that involves no use of heat, noise, or odor-producing processes on the premises that are detectable off-site” and “Manufacturing” is defined as “[t]he processing, fabrication, production or assembly of materials or products, not including light manufacturing.” § 2.0 of the Zoning Bylaw. Both light manufacturing and manufacturing are allowed as-of-right in the Industrial district and the PUD-I overlay district. § 5.3 of the Zoning Bylaw. There are no further limitations regarding the type of nature of the products produced. Accordingly, the Zoning Bylaw permits as-of-right manufacturing or products associated with renewable or alternative energy.

### Feasibility of Additional Development

Town Staff shared that the development of more than 50,000 square feet of renewable or alternative energy research and development and manufacturing facilities is feasible within the above identified districts. In the Industrial/PUD-I Overlay district there is approximately 95,000 square feet of vacant, leasable space within an existing building.<sup>2</sup> Staff is aware of three other buildings that contain vacant leasable space in excess of 5,000 square feet; two in the Business B district<sup>3</sup> and one in the Industrial and PUD-I Overlay districts.<sup>4</sup> There are also at least three vacant parcels of land in the Business B, Industrial, and PUD-I Overlay districts. Two of these parcels exceed 10,000 square feet of land.<sup>5</sup>

In addition, the Town is working with design consultants to reimagine the area to support and encourage the growth of research and development businesses. This process aligns with community goals and standards developed through a public process. Notably, a large portion of the Industrial District was designated a Priority Development Area during the North Suburban Planning Council (NSPC) 2014 Priority Mapping Project,<sup>6</sup> and is discussed in the Town’s Economic Development Action Plan 2016-2022.<sup>7</sup> Currently, many areas of the Industrial District are not at their highest and best use and the Town is working with design consultants to reimagine

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<sup>2</sup> 128 Marketplace and 1 General Way.

<sup>3</sup> 25 Haven Street (approximately 7,900 square feet of leasable space) and 17 Harnden Street (approximately 14,000 square feet of leasable space).

<sup>4</sup> 218 Ash Street (approximately 8,000 square feet of leasable space).

<sup>5</sup> 18-22 Woburn Street (approximately 4,000 square feet of land) and 16 Sanborn Street (approximately 12,000 square feet of land) in the Business B district. 246 Ash Street (approximately 26,000 square feet of land) in the Industrial and PUD-I Overlay districts.

<sup>6</sup> Available at [http://www.mapc.org/wpcontent/uploads/2017/10/NSPC\\_PriorityMappingFinalReport\\_Narrative\\_FINAL\\_Jan2014\\_FINAL.pdf](http://www.mapc.org/wpcontent/uploads/2017/10/NSPC_PriorityMappingFinalReport_Narrative_FINAL_Jan2014_FINAL.pdf)

<sup>7</sup> Available at [https://www.readingma.gov/sites/g/files/vyhlif1116/f/uploads/readingedactionplan\\_narrativeappendicesmerged\\_2016-2022\\_0.pdf](https://www.readingma.gov/sites/g/files/vyhlif1116/f/uploads/readingedactionplan_narrativeappendicesmerged_2016-2022_0.pdf)

the area, as well as considering the potential for amending the Zoning Bylaw to make the Industrial District more attractive for research and development.

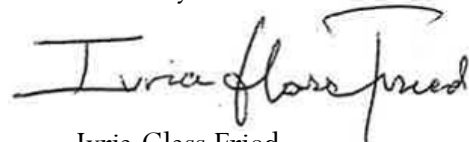
**Criterion 2: Adopt an expedited application and permit process for as-of-right energy facilities**

The Town satisfies Criterion 2 because nothing in the Zoning Bylaw or the Community Planning and Development Commission (CPDC) procedures or regulations precludes issuance of a permitting decision within one year. While energy facilities are allowed as-of-right, they may be subject to Site Plan Review (§ 4.6 of the Zoning Bylaw). Site Plan Review is required for proposed construction or site alteration that: 1) increases gross floor area by 500 square feet or more; 2) changes a use, from one use category to another, within an existing institutional, commercial, or multi-family structure; or 3) adds 2 or more parking spaces, changes the layout or location of 2 or more parking spaces, increases pavement by more than 300 square feet, or alters a driveway. See § 4.6.2.2 of the Zoning Bylaw.

Site plan approval can be accomplished in less than a year under the Zoning Bylaw. Once an applicant submits an application for site plan review, the Community Development Director (the “Director”) is required to notify the applicant within 10 days if there are issues related to the completeness of the application. See § 4.6.3.1(c) of the Zoning Bylaw. If the application is complete the Director must date stamp the application. Id. The CPDC must schedule a public hearing to be held within 45 days of the date stamp and issue a decision on the application within 45 days of the close of the public hearing. See § 4.6.3.1(e) of the Zoning Bylaw. Thus, it is possible for an applicant to receive site plan approval for an energy facility within 3.5 months of submission of an application.<sup>8</sup>

Please feel free to contact me with any questions you may have.

Sincerely,



Ivria Glass Fried

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<sup>8</sup> To the extent permits beyond Site Plan Approval are required, such as orders of condition under the Wetlands Protection Act, G. L. c. 131, § 40, the deadlines are set by statute and the Town wetlands bylaw mirrors the state statute.