



Town of North Reading
Massachusetts

Town Administrator

February 1, 2019

Greg Watson
Manager of Comprehensive Permit Programs
MassHousing
1 Beacon Street
Boston, MA 02108

Dear Mr. Watson:

Please accept this second comment letter from the Town of North Reading, supplementary to its response letter of January 15, 2019, regarding NY Ventures LLC's submittal to MassHousing dated December 3, 2018 for a Project Eligibility Letter (PEL) for the property located at 20 Elm Street, North Reading. The Town appreciates the additional time granted to provide comments to MassHousing. We are submitting these comments along with additional letters that were received from residents since our comment period was extended.

The Town of North Reading has taken a comprehensive approach to planning for affordable housing within the context of existing conditions in the Town. The areas that the Town has identified for affordable housing represent the optimum balancing of housing needs with land use, demographic, infrastructure and environmental considerations.

One of these environmental considerations is water quality in the Ipswich River. It has long been recognized that the Ipswich is highly stressed. DEP's Integrated Waters list, prepared under the Federal Clean Water Act, lists the Ipswich River as impaired with respect to mercury and dissolved oxygen, and therefore in need of Total Maximum Daily Loads (TMDLs) for those parameters. It is the Town's opinion that it is less than ideal land use planning to encourage intense housing development on the banks of this impaired river. This is particularly pertinent in North Reading, where there are no municipal sewers, and new housing projects must rely on private treatment systems with subsurface discharge; in this case, on or very near the river bank. The areas in North Reading that have been identified for new affordable housing development reflect the town's desires to protect the Ipswich River.

Additionally, the Town wishes to point out an issue that is not fully addressed in NY Ventures' submittal to MassHousing. DEP has a policy that requires developers seeking a groundwater discharge permit to offset 100% of new contaminant loads to impaired waters by providing infrastructure to reduce existing contaminant sources in the same watershed. Inability to do so would prevent the developer from obtaining this critical permit, and meeting that DEP requirement could add significantly to the developer's cost and delay the project. Further, to protect public drinking water supplies downstream, the developer would be required to provide a very high level of wastewater treatment at considerable cost.

It is for these reasons, along with the reasons stated in the Town's letter of January 15, 2019, that we believe that **the proposed site is not appropriate for this project.**

Sincerely,

A handwritten signature in black ink that reads "Michael P. Gilleberto". The signature is written in a cursive style with a large initial 'M'.

Michael P. Gilleberto
Town Administrator

cc: Select Board
Danielle McKnight, Town Planner
Town of North Reading Development Review Team