



Town of Reading
16 Lowell Street
Reading, MA 01867

Historic District Commission
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Date _____, 2015

Criterion Child Enrichment, Inc.
Application for Certificate of Appropriateness

To the Town Clerk:

This is to certify, that at a public hearing of the Town of Reading Historic District Commission (HDC) opened on October 14, 2015 and closed on November __, 2015 by a motion duly made and seconded, it was voted by a majority of a quorum then present (___-___) to:

(1) approve the application of Criterion Child Enrichment, Inc. (the "Applicant"), filed on August 24, 2015, for a Certificate of Appropriateness related to work proposed at 186-190 Summer Avenue (Assessors Map 15, Lot 294, 295 & 296) subject to the Findings set forth in ¶¶56-61 and Conditions set forth below; and

(2) approve the Applicant's application, filed on August 24, 2015 for a Certificate of Non-Applicability related to work proposed at 186-190 Summer Avenue (Assessors Map 15, Lot 294, 295 & 296) as set forth in ¶¶53-55 below.

MATERIALS SUBMITTED BY THE APPLICANT

Submitted August 24, 2015

Application for a Certificate of Non-Applicability, Appropriateness, Hardship

Letter of Criterion counsel, Kenneth N. Margolin, to HDC Chair, Everett Blodgett, dated August 20, 2015, introducing and summarizing Criterion's application

Affidavit of Seller authorizing Robert F. Littleton, Jr., on behalf of Criterion Child Enrichment, Inc. ("Criterion"), to seek all necessary approvals from the HDC

Statement of Existing Conditions;
Materials List (Exhibit "A" to Statement of Existing Conditions)

Architect Drawings consisting of 12 pages, prepared by DHK Architects,
Boston, MA:

- A-00: Existing Site Plan
- A-01: South & West Elevations
- A-02: North & East Elevations

A-03: Existing Elevation Images

A-04: Existing Elevation Images

A-05: Existing Elevation Images

A-06: Basement Floor Plan

A-07: First Floor Plan

A-08: Second Floor Plan

A-09: Third Floor Plan

A-10: Cupola & Roof Plan

Engineering plans, consisting of 3 pages, prepared by Sullivan Engineering Group, LLC, Woburn, MA:

Existing Conditions

Site Plan

Grading Plan

Memorandum of Law by Criterion's counsel, regarding the Parker Middle School driveway as not within the definition of "Public Way"

Opinion of Reading Town Council filed in Criterion's prior application, regarding the applicability of the Dover Amendment, *MGL c. 40A, §3*, and the Americans with Disabilities Act, to Criterion's project

Affidavit of Robert F. Littleton, Jr., in support of the applicability of the Americans with Disabilities Act to Criterion's project

Memorandum of Law by Criterion's counsel, regarding the applicability of the ADA to Criterion's project

Submitted September 3, 2015

Letter from Kenneth N. Margolin to Everett Blodgett, dated September 3, 2015, agreeing to extend time for a hearing and decision

Submitted September 23, 2015

Applicant's Memorandum of Law Regarding Exclusion of Parking Spaces and Landscaping from the Jurisdiction of the Historic District Commission

Criterion Child Enrichment, Inc.'s Reservation of Rights with Respect to the Testimony of Peter Quigley, PE, DBIA

Submitted October 7, 2015

Decision of the Town of Reading Community Planning and Development Commission, filed with the Town Clerk on January 22, 2015, regarding Criterion Child Enrichment, Inc.'s Site Plan

Submitted October 8, 2015

Minutes dated March 23, 2015, of proceedings before the Town of Reading Historic District Commission

Submitted October 9, 2015

Applicant's Proposed Decision of the Historic District Commission

Submitted October 29, 2015

Plan of Existing Conditions, Revision No. 5 dated 10/28/15

Site Plan, Revision No. 5 dated 10/28/15

Grading Plan, Revision No. 5 dated 10/28/15

FINDINGS OF FACT

Background

1. The Applicant proposes to renovate an existing historical house, historical barn and non-historical addition to the house located at 186-190 Summer Avenue (the "Property") for use as an educational facility. The non-historical addition is proposed to be renovated and connected to the historical barn via an underground tunnel.
2. The historical house and barn, known as "Kemp Place" were built in 1853 for Robert "Father" Kemp and placed on the National Register of Historic Places in 1984. The house and barn, considered to be Reading's finest examples of Italianate architecture, are situated within the Summer Avenue Historic District (the "District"). Properties within the District include historical homes dating from 1807 through the early 1900's.
3. The existing historical house and existing non-historical addition, while structurally sound, are in need of extensive repair and renovation including painting and replacement of wood trim, siding and flashing.

4. The existing historical barn is in poor shape, with evidence of major structural distress. The exterior of the barn requires extensive repair, repainting and window replacement and repair.
5. The preservation of the existing historical house and barn fulfills an important purpose of the Massachusetts Historic District Act, *M.G.L. c.40C* and the Town of Reading Local Historic District Bylaw, Town of Reading General Bylaws §7.3.
6. The historical house and barn are visible from Summer Avenue, on the Property's Western boundary, and from portions of an access road to the Parker Middle School, to the East of the Property.
7. The Applicant plans to use the Property to operate an Early Intervention program for infants and toddlers, an educational use that is allowed as of right in all zoning districts under *M.G.L. c.40A, §3, ¶2*, commonly known as the "Dover Amendment."
8. In a prior application, filed February 10, 2015, the Applicant proposed to renovate the existing historical house, stabilize and preserve for future renovation, the existing historical barn on the property, and demolish the existing non-historical addition to the historical house, and replace it with a 4,274 square foot new addition, to be connected to the historical house by means of a new breezeway entry vestibule.
9. At the public hearing on the prior proposal, opened on March 23, 2015, the HDC expressed concern that the proposed addition added too much bulk and mass to the property. The HDC voted to deny a certificate of appropriateness for the proposal and, by letter dated July 21, 2015, the Applicant withdrew its application for a certificate of hardship.
10. The Applicant filed the current proposal on August 24, 2015 and presented the current proposal to the HDC on October 14, October 22 and October 29, 2015.

The Proposal

11. With its current proposal, the Applicant represents that it will not demolish any portion of the existing house, non-historical addition, or barn, and will leave the footprint of the existing structures unchanged.
12. The Applicant proposes to stabilize and renovate the existing historical barn, and to renovate the existing historical house and the existing non-historical addition to the house.
13. The Applicant additionally proposes to construct an underground connector, which it represents would not be visible from a public way or street, creating

a passageway between the existing historical house and existing non-historical addition, to the existing historical barn.

14. In its submissions to the HDC, the Applicant has identified six categories of proposed exterior changes that will be visible from Summer Avenue or the school access road as follows:
 - a. A new entry door will be placed on the East façade of the existing non-historical addition. The door will be visible from the school access road, but not from Summer Avenue.
 - b. On the East façade of the addition, grading will be altered that will hide the wood-covered foundation wall, currently visible from the school access road, and four new exterior HVAC units that will be placed along the East façade that would otherwise be visible from the school access road.
 - c. A hole the foundation of the East façade of the addition, currently visible from the school access road, will be hidden by new grading.
 - d. A new door and two new windows will be installed at the basement level of the historical barn, on its South façade. The new door and windows will be visible from the school access road.
 - e. An existing hole on the East façade of the historical barn, visible from the school access road, will be filled in.
 - f. A replacement window will be installed on the East façade of the barn where the current window frame is covered with plywood and TYPAR. The new window will be visible from the school access road.
15. The Applicant has represented that all exterior architectural changes will respect the existing historical features.
16. The Applicant has proposed to construct a large, continuous paved area comprised of a 24-foot wide drive connecting Summer Avenue to a parking lot at the rear of the property. The proposed drive would have 13 parking spaces, including four handicapped parking spaces, along the drive adjacent to the historical house, and six parking spaces along the drive behind the historical barn. The parking lot at the rear of the property would have 19 more parking spaces, for a total of 38 parking spaces, and vehicle turnarounds to accommodate emergency and trash collection vehicles.
17. The Applicant has represented that it will retain all exterior features of the existing historical house, except as noted at ¶¶14 and 16 of this Decision, and, where feasible, to be determined by the Applicant during renovation, the Applicant will retain the existing exterior materials. If existing materials are deteriorated, such that their appearance or durability, as determined by the Applicant during renovation, are compromised, the Applicant has proposed to

- replace the existing materials with natural materials to match the appearance of the existing exterior materials to be replaced. During the renovation of the existing historical house, the Applicant represents that it will comply with the details of the document submitted to the HDC, titled, "Criterion Reading Historic District Commission Hearing Exterior Materials August 20, 2015." ("Attachment A," hereby incorporated into this Decision.)
18. The Applicant has represented that it will retain all exterior features of the existing historical barn, except as noted at ¶¶ 14 and 16 of this Decision, and, where feasible, to be determined by the Applicant during renovation, the Applicant will retain the existing exterior materials. If existing materials are deteriorated, such that their appearance or durability, as determined by the Applicant during renovation, are compromised, the Applicant has proposed to replace the existing materials with natural materials to match the appearance of the existing exterior materials to be replaced. During the renovation of the existing historical barn, the Applicant represents that it comply with the details set forth in Attachment A.
 19. The Applicant will be conducting interior work on the foundations of the existing structures that are not subject to the jurisdiction of the HDC. Nevertheless, in response to concerns expressed by HDC members as to whether the structural integrity of the existing structures would be jeopardized by the foundation work, the Applicant presented, under a Reservation of Rights, the testimony of Peter Quigley, an engineer with expertise in protecting the structural integrity of buildings during foundation work. Mr. Quigley explained the methods to be used in protecting the existing historical house, non-historical addition, and historical barn, during work on the foundations. He stated that the methods to be used are routine in the engineering industry, widely used and tested, and highly effective.
 20. With respect to the historic house, the Applicant has represented that it will have lead remediation work performed on windows on the historic house, but that the Applicant intends to maintain the original windows on the house. Windows will be replaced only if necessary. The Applicant has also represented that non-matching storm windows attached to the windows on the historic house will be removed and replaced with matching storm windows.
 21. The Applicant has represented that it will replace the doors on the South façade of the addition with custom wood doors.
 22. The Applicant has represented that it will use rubble stone from an existing retaining wall that the Applicant has proposed to remove for the construction of the retaining wall around the HVAC units on the East façade of the addition.
 23. The Applicant has represented that the existing hole in the foundation of the East façade of the addition will be partially blocked by the proposed underground tunnel, and the remainder of the hole will be filled in.

24. At the hearing on October 29, 2015, the Applicant acknowledged that railings will be needed for safety around the sunken HVAC units on the East façade of the addition and around the new stairwell proposed for the East façade of the barn. The Applicant has represented that such railings will be period-appropriate wrought iron railings.
25. With respect to the historical barn, the Applicant has proposed to replace the door on the West façade of the historical barn, visible from Summer Avenue, with a new door better suited to accommodate the level of traffic passing through the doorway. The Applicant has represented to the HDC that it intends to replace the door with an historically suitable replacement and that the Applicant will return to the HDC with plans for the door before installation.
26. The Applicant has represented that the five openings on the South façade of the barn will be covered with glass from the inside, resulting in no external change to the appearance of said openings.
27. The Applicant has represented that the hole on the East façade of the barn will be filled with wood and then clapboard will be extended down to match the rest of the barn.
28. The Applicant has represented that the new stairwell on the East façade of the barn will be constructed of concrete and a new retaining wall will be constructed.
29. The Applicant has represented that the new door and windows in the new stairwell on the East façade of the barn will be made of wood. The door will be a replica of a door currently on the South façade, and the windows will be replicas of the attic window on the historical house.
30. The Applicant has represented that one of the windows on the East façade of the barn must be replaced, and that the Applicant will do so with a replica of an historical window frame on the same façade.
31. The Applicant has eliminated one light pole from its original proposal and represented that the two light poles now proposed for the Property will consist of historically appropriate poles.
32. The Applicant has represented that all other work to be performed on the structures is either (1) not visible from a public way or street, or (2) involves ordinary repair, maintenance or replacement of exterior architectural features.
33. The HDC notes that the Applicant's parking plan has been approved by the Town of Reading Community Planning and Development Commission (the "CPDC").

34. The Applicant requested suggestions from the HDC that would make the proposal acceptable to the HDC. In response, the HDC provided a list of suggested modification that would mitigate the visual impact of paved areas and parked vehicles impairing the setting and views of the historical structures. The HDC did not require such modifications, or commit to any particular decision as a result of its suggestions, and invited any further suggestions from the Applicant that could achieve the same goal.
35. At the public hearing on October 22, 2015, the HDC expressed concern regarding the impact of the paved areas described in ¶16 of this Decision on the setting of the historical structures. The Applicant responded to the HDC's concerns on October 29, 2015, and proposed to modify its original proposal to mitigate the visual impact of the paved structures on the historical setting by:
- a. Reducing the width of the drive from 24-feet to 20-feet, subject to approval by the CPDC;
 - b. Shifting four regular parking spaces originally proposed to be placed near the Property's frontage on Summer Avenue to the rear of the Property;
 - c. Requesting that the CPDC reduce or eliminate the "No-parking" signage requirement along the edge of the drive;
 - d. Using pervious paving material for the front portion of the paved areas extend back to the parking lot at the rear of the property, eliminating curbing along the South edge of the drive and eliminating curbing along the North edge of the drive from Summer Avenue to the first parking space;
 - e. Screening the parking spaces closest to Summer Avenue with plantings;
 - f. Keeping all grading within six to eight inches of existing grading on the Property; and,
 - g. Without conceding the HDC's jurisdiction over plantings, the Applicant has represented that it will plant three trees along the North side of the drive near the West boundary of the property and six trees along the South side of the drive reduce the visual impact of the paved areas.
36. The modifications to the Applicant's proposal as set forth in ¶35 are shown in the Revised Site Plan and Revised Grading Plan dated October 28, 2015. ("Attachment B," incorporated herein by reference.)

Findings Related to Non-Applicability

37. The jurisdiction of the HDC extends to “exterior features” of buildings and structures within the Historic District, “exterior features” meaning “such portion of the exterior of a building or structure as is open to view from a public street, public way, public park or public body of water, including but not limited to the architectural style and general arrangement and setting thereof, the kind, color and texture of exterior building materials, the color of paint or other materials applied to exterior surfaces and the type and style of windows, doors, lights, signs and other appurtenant exterior fixtures.” *M.G.L. c. 40C, §5; Town of Reading General Bylaw, §7.3.2.8.*
38. Certain items are excluded from the HDC's review, including terraces, walks, driveways, sidewalks and similar structures, that are substantially at grade level; walls and fences, or either of them; storm doors and windows, screens, window air conditioners, lighting fixtures, antennae and similar appurtenances; the color of paint; and the color of materials used on roofs. *M.G.L. c. 40C, §8; Town of Reading General Bylaw, §7.3.9.1.*
39. Neither the Historic Districts Act nor the Town of Reading's Historic District Bylaw may be construed to prevent ordinary maintenance, repair or replacement of any exterior architectural feature within an historical district which does not involve a change in design, material, or the outward appearance thereof, nor to prevent landscaping with plants, trees or shrubs, nor construed to prevent the meeting of requirements certified by a duly authorized public officer to be necessary for public safety because of an unsafe or dangerous condition. *M.G.L. c. 40C, §9; Town of Reading General Bylaw, §7.3.9.3.*
40. The HDC determined on October 22, 2015, that, because of its continuous nature, the paved area proposed by the Applicant comprises one structure.
41. The HDC further determined on October 22, 2015, that its jurisdiction extends over the Applicant's proposed paved areas because the size and use of such areas are substantially different from driveways that are exempt from the HDC's jurisdiction pursuant to *M.G.L. c. 40C, §8*, and the Town of Reading General Bylaw, §7.3.9.1.
42. The HDC notes that it does not have jurisdiction over storm windows although the Applicant has included the replacement of non-matching storm windows in its application.
43. The Applicant initially contested the status of the school access road as a public way or street for purposes of *M.G.L. c. 40C, §5*. In order to focus the issues before the HDC, however, the Applicant subsequently conceded the road's status and waived its objection to the HDC's jurisdiction over exterior architectural features visible from the school access road.

44. To the extent that work proposed by the Applicant is not visible from either Summer Avenue or the school access road, the HDC does not have jurisdiction over such work and the HDC finds that the Applicant is entitled to a Certificate of Non-Applicability.
45. Specifically, the HDC finds that the following work proposed by the Applicant will not be visible from either Summer Avenue or the school access road:
 - a. Interior foundation repairs;
 - b. Installation of HVAC units below the surrounding grade; and,
 - c. The proposed underground tunnel connecting the addition to the historical barn.
46. At the hearing on October 29, 2015, the Applicant responded to questions regarding the work set forth in Attachment A.
47. With respect to item 8 under "Existing House," which describes re-flashing of edges, the Applicant explained that the edges in question are on the underside of the porch roof and are not visible from a public way.
48. With respect to item 10 under "Existing House," which describes foundation repairs to be made with "granite clapboard" the Applicant stated that it should read "granite block."
49. With respect to item 3 under "Existing Barn," which describes the installation of a new barn door, the HDC determined that such installation must be reviewed for a Certificate of Appropriateness rather than Non-Applicability because the proposed modification involves the creation of a new door rather than ordinary repair, maintenance or replacement.
50. With respect to item 4 under "Existing Barn," which describes the refinishing of a "natural finish wood door," the Applicant clarified that the door to be refinished is the door on the South façade of the barn.
51. The Applicant further represented that three windows on the North façade of the barn, not listed on Attachment A, will be repaired, and the existing clapboard trim blocking such windows will be maintained. The HDC determined that the work as described by the Applicant should be considered for a Certificate of Non-Applicability.
52. To the extent that work proposed by the Applicant constitutes ordinary repair, maintenance or replacement, the HDC finds that the Applicant is entitled to a Certificate of Non-Applicability.
53. Specifically, the HDC finds that the repairs proposed on the three windows on the North façade of the barn, as described in ¶51 of this Decision, and the work proposed set forth in the Attachment A, except for the door installation

described in ¶49 of this Decision, constitute ordinary repair, maintenance, or replacement to the extent that exterior materials are to be replaced in kind.

54. The HDC further finds that the Applicant's proposal regarding replacement of deteriorated materials, as described in ¶¶17 and 18 of this Decision, lacks sufficient detail for the HDC to make either a determination of non-applicability or appropriateness at this time. Moreover, placing these decisions in the Applicant's sole discretion would significantly impair the HDC's ability to review changes to exterior architectural features within the District as it is required to do under Reading's Historic Districts Bylaw. As such, this Decision is conditioned on the Applicant returning to the HDC with sample materials for a determination of non-applicability or appropriateness prior to the replacement of any existing exterior materials.

Findings Related to Appropriateness

55. In deciding whether a Certificate of Appropriateness should be granted, the HDC "shall consider, among other things, the historical and architectural value and significance of the site, building or structure, the general design, proportions, detailing, mass, arrangement, texture, and material of the exterior architectural features involved, and the relation of such exterior architectural features to similar features of buildings and structures in the surrounding area." *M.G.L. c. 40C, §7; Town of Reading General Bylaw, §7.3.8.1.*
56. When considering the appropriateness of new construction or additions to existing buildings or structures, the HDC "shall consider the appropriateness of the size and shape of the building or structure both in relation to the land area upon which the building or structure is situated and to buildings and structures in the vicinity, and the commission may in appropriate cases impose dimensional and set-back requirements in addition to those required by applicable ordinance or by-law." *M.G.L. c. 40C, §7; Town of Reading General Bylaw, §7.3.8.2.*
57. The exterior architectural changes proposed for the existing house, addition and barn will be minor, particularly when taking into account the existing condition of the addition and the poor structural condition of the existing historical barn.
58. In order to protect the historical character of the Property, the Applicant shall place a historic preservation restriction, in a form acceptable to Town Counsel, on the Property, prior to the commencement of any work authorized by the Certificate of Non-Applicability or the Certificate of Appropriateness.
59. The proposed parking structure is out of character for the Property and detracts from the historical setting. The parking structure, however, is necessary for the Applicant to operate its proposed programs, as it is

permitted to do by right. Additionally, the Applicant has taken steps to mitigate the impact of the parking structure and has agreed to remove the parking structure if the Property is no longer primarily used for a protected use, or to impose such a requirement on a subsequent owner if the Applicant conveys the Property.

60. Having considered, among other things, the historical and architectural value and significance of the site and structures, the general design, proportions, detailing, mass, arrangement, texture, and material of the exterior architectural features involved, and the relation of such exterior architectural features to similar features of buildings and structures in the surrounding area, the HDC finds that the Applicant's proposal is appropriate for and compatible with the preservation and protection of the District, subject to the conditions set forth below.

RULING AND CONDITIONS

Ruling

Criterion Child Enrichment, Inc.'s application for a Certificate of Non-Applicability is ALLOWED to the extent that proposed work is either not visible from a public way or street and to the extent that proposed work constitutes ordinary repair, maintenance or replacement as set forth in ¶¶52-54 of this Decision.

Subject to the terms and conditions of this Decision, Criterion Child Enrichment, Inc.'s application for a Certificate of Appropriateness, is ALLOWED.

Conditions

1. All work on the existing historical house, existing historical barn, and the new addition, shall substantially conform to the proposal submitted by the Applicant to the Historic District Commission, on August 24, 2015.
2. During work on the existing historical barn, the Applicant shall employ adequate measures to protect the structure of the barn from damage that could threaten the stability of the barn.
3. The Applicant shall not demolish any portion of the existing house, non-historical addition, or barn, and will leave the footprint of the existing structures unchanged.
4. The underground connector creating a passageway between the existing non-historical addition to the existing historical barn shall not be visible from a public way or street.
5. All exterior architectural changes shall respect the existing historical features of the historical house and barn.

6. Prior to the installation of the proposed replacement door on the West façade of the historical barn, the Applicant will return to the HDC with plans for the door to verify that the door is appropriate for the historical structures.
7. The Applicant shall retain all exterior features of the existing historical house, except as noted at ¶¶14 and 16 of this Decision, and, where feasible, the Applicant shall retain the existing exterior materials. If existing materials are deteriorated, such that their appearance or durability, are compromised, and the Applicant intends to replace such with materials that are not in-kind, the Applicant shall submit an application to the HDC for an application of non-applicability or appropriateness and shall provide the HDC an opportunity to review samples of proposed replacement materials prior to installation of replacement materials.
8. During the renovation of the existing historical house, the Applicant shall comply with the details of Attachment A.
9. The Applicant shall retain all exterior features of the existing historical barn, except as noted at ¶¶14 and 16 of this Decision, and, where feasible, the Applicant shall retain the existing exterior materials. If existing materials are deteriorated, such that their appearance or durability, are compromised, the Applicant shall submit an application to the HDC for an application of non-applicability or appropriateness and shall provide the HDC an opportunity to review samples of proposed replacement materials prior to installation of replacement materials.
10. During the renovation of the existing historical barn, the Applicant shall comply with the details set forth in Attachment A.
11. The Applicant shall use rubble stone from the existing retaining wall for construction of the new retaining wall around the HVAC units on the East façade of the addition.
12. To the extent that the hole on the East façade of the addition is not blocked by the new underground connector, the Applicant shall fill the hole with material matching the exposed portion of the foundation.
13. Railings installed around the sunken HVAC units on the East façade of the addition and around the new stairwell proposed for the East façade of the barn shall be made of wrought iron and shall be period appropriate.
14. The Applicant shall fill the hole on the East façade of the barn with wood that shall be clapboarded over to match the existing façade.
15. The new door and windows to be installed in the new stairwell on the East façade of the barn shall be made of wood. The door shall be a replica of the door currently on the South façade of the barn, and the windows shall be replicas of the attic window on the historical house.

16. The window on the East façade of the barn that requires replacement shall be replaced with a replica of the other historical window frame on the same façade.
17. As shown on Attachment B, the Applicant shall:
 - a. Reduce the width of the drive from 24-feet to 20-feet;
 - b. Shift four regular parking spaces originally proposed to be placed near the Property's frontage on Summer Avenue to the rear of the Property;
 - c. Request that the CPDC reduce or eliminate the "No-parking" signage requirement along the edge of the drive
 - d. Use pervious paving material for the paved areas extending from Summer Avenue back to the rear parking area;
 - e. Not install curbing along the South edge of the drive from Summer Avenue to the rear parking area or along the North edge of the drive from Summer Avenue to the first parking space; and,
 - f. Plant trees along the paved areas as shown on Attachment B.
18. All other work as described in the proposal submitted by the Applicant to the Historic District Commission, on August 24, 2015, shall: (1) not be visible from a public way or street, or (2) involve ordinary repair, maintenance or replacement of exterior architectural features.
19. The Applicant shall remove the paved areas if the Property is no longer primarily used for a use protected under the Dover Amendment, or shall impose such a requirement on a subsequent owner if the Applicant conveys the Property.
20. The Applicant shall place a historic preservation restriction on the Property, in a form acceptable to Town Counsel, prior to the commencement of any work authorized by the Certificate of Non-Applicability or the Certificate of Appropriateness; said restriction to be held by the Reading Historical Commission.

TOWN OF READING
HISTORIC DISTRICT COMMISSION

Dated: _____, 2015.

DRAFT