

March 26, 2024

Reading Conservation Commission
16 Lowell Street
Reading, MA 01867

**RE: Notification of Utility Maintenance Activities (Public Utility Maintenance Exemption) and Exempt Minor Activities Under MGL 131, Section 40, Wetlands Protection Act & Reading Wetlands Protection Bylaw
Gas Main Replacement John St, Reading MA
Boston Gas Company**

Dear Members of the Reading Conservation Commission,

The Boston Gas Company (BGC) is submitting this written notification to inform the Commission of necessary utility maintenance activities associated with the replacement of existing sections of gas main along John St and John St Ct in Reading, MA (the "Project"). The location of the proposed activities is shown on the Environmental Resources (ER) Map and USGS Site Locus Map in **Attachment B**.

BGC maintains gas mains regularly to avoid degradation and to increase capacity for distribution. To complete this necessary work in Reading, BGC will excavate along and replace approximately 2,940 feet of existing gas main from 1 to 130 John Street and 8 to 17 John St Ct. Of the 2,940 feet, approximately 250 linear feet is within the 100 ft Buffer Zone to Bordering Vegetated Wetland (BVW). BGC will replace existing buried coated steel gas main with plastic gas main of the same size. BGC will conduct all work within the paved roadway limits, which will result in 4,492 square feet of temporary disturbance to the roadway within the buffer zone.

Exempt Maintenance Activities under the Wetlands Protection Act

Gas main replacement within jurisdictional resources areas is an exempt maintenance activity per the WPA at M.G.L. Ch. 131, S. 40, which allows for *maintaining, repairing or replacing, but not substantially changing or enlarging, an existing and lawfully located structure or facility used in the service of the public and used to provide electric, gas, sewer, water, telephone, telegraph and other telecommunication services* without filing written notice. To comply with the implementing regulations at 310 CMR 10.02(2)(a)(2) for exempt activities, BGC will implement best management practices during construction of the Project and will restore disturbed areas to the extent practicable following Project completion.

Exempt Maintenance Activities under the Reading Wetlands Protection Bylaw

Utility maintenance is also exempt under Article 7.1.3 of the Town of Reading General Bylaw, which is similar to the WPA exemption and allows for alteration of resource areas in the course of *"maintaining, repairing or replacing, but not substantially changing or enlarging an existing and lawfully located structure or facility used in the service of the public and used to provide electric, gas, water..."* without filing a Notice of Intent.

BGC is sending this letter to provide notification of maintenance activities prior to the commencement of work, and to express BGC's commitment to protecting wetland resource areas. The sections below provide additional information regarding the proposed activities and BMPs.

Maintenance Activities within Jurisdictional Areas

BGC's environmental consultant performed a desktop analysis of environmental constraints within proximity of the Project area using available GIS data layers including MassDEP wetlands and hydrologic connections, the most recent FEMA National Flood Hazard Mapping, Natural Heritage and Endangered Species Program ("NHESP") Priority and Estimated Habitat, Certified and Potential Vernal Pools, Areas of Critical Environmental Concern ("ACEC"), Zone II Wellhead Protection Areas, and Surface Water Protection zones.

Based on the desktop analysis, Project activities are within the 100-ft Buffer Zone to Bordering Vegetated Wetland. No other jurisdictional wetland resource areas were identified within proximity to the Project. Personnel and vehicle access will be from the existing roadway.

PROPOSED WORK DESCRIPTION

BGC proposes to replace existing gas pipeline with new 8 inch and 4-inch gas main and abandon the old main in place along John St and John St Ct. The replacement activities will cause temporary disturbance of the roadway surface including cutting the pavement and trenching to approximately 18-inches wide with at least 12-inches of clearance between the replacement gas main and the surface. Crews will backfill the trench using the excavated material, if suitable, and patch the roadway surface.

The general sequence of construction includes the following:

- Contractor will call DigSafe at least 72 hours prior to construction and verify the location of all existing underground utilities and structures.
- Crews will install BMPs for erosion and sedimentation control.
- Per request, crews will not park within the Buffer Zone while operating on the Project.
- An operator in a small backhoe or similar machinery will excavate the trench, side casting material for backfill.
- Crews will install the 4 " gas main in the trench and tie into the existing gas main.
- Crews will transfer services to the new gas main and purge old mains out of service to abandon the lines in-place.
- BGC will perform restoration, including removing all unsuitable soils from the site and repaving/patching the roadway surface, and removing erosion controls.

Construction Methods and Proposed Mitigation Techniques

BGC has established procedures followed by all employees and its contractors for accessing sites and performing construction activities on gas lines. These procedures, discussed in National Grid's Environmental Guidance for [ROW Access, Maintenance and Construction Best Management Practices](#) (EG-303NE), ensure that BGC's projects are completed in accordance with all applicable environmental laws and regulations as well as with BGC policies and compliance objectives. This maintenance project will be completed using conventional construction techniques, as follows:

Erosion and Sediment Controls

Ground disturbance associated with the Project will be limited to the existing paved roadway. Displaced soil will be managed away from wetland resource areas and will be used as backfill. Any remaining spoils will be disposed of appropriately offsite. Sediment controls will be installed prior to commencing work, as needed, and may include straw bales, fiber rolls, or straw wattles. Furthermore, silt sacks may be placed within catch basins along the project route.

Dewatering

If dewatering is necessary, discharge water will be pumped through a filter bag located in an upland area. The bag may be surrounded with additional sediment filtration such as fiber rolls, straw bales, or other appropriate containment.

Stormwater Management

There will be no change in grade or increase in impervious area as a result of this Project. Therefore, additional stormwater management appurtenances will not be required.

Restoration

Temporarily disturbed areas will be stabilized, and the construction site will be restored to pre-construction conditions to the extent practicable. Construction materials, vehicles, and non-biodegradable sediment controls will be removed from the site upon completion of work.

Conclusion

As described above, maintenance activities and associated access are located within the 100-ft Buffer Zone only. BGC anticipates that the use of BMPs throughout construction of the Project will avoid impacts to adjacent resource areas. Overall, the Project is part of routine maintenance needed to mitigate potential risks to the general public, maintain utility infrastructure, and provide reliable delivery of gas service to customers.

The above-described maintenance activities are scheduled to begin soon. If you have any questions or would like more information regarding the enclosed information, please contact me at (774) 291-9348 or Honora Lovelace Tisell (BSC Group) at (617) 896-4492. Thank you in advance for your attention to this matter.

Sincerely,
Boston Gas Company



Patrick Hutchinson
Environmental Scientist

Attachment:
USGS Site Location Map
Environmental Resources (ER) Map

cc: Honora Lovelace Tisell, BSC Group, Inc.



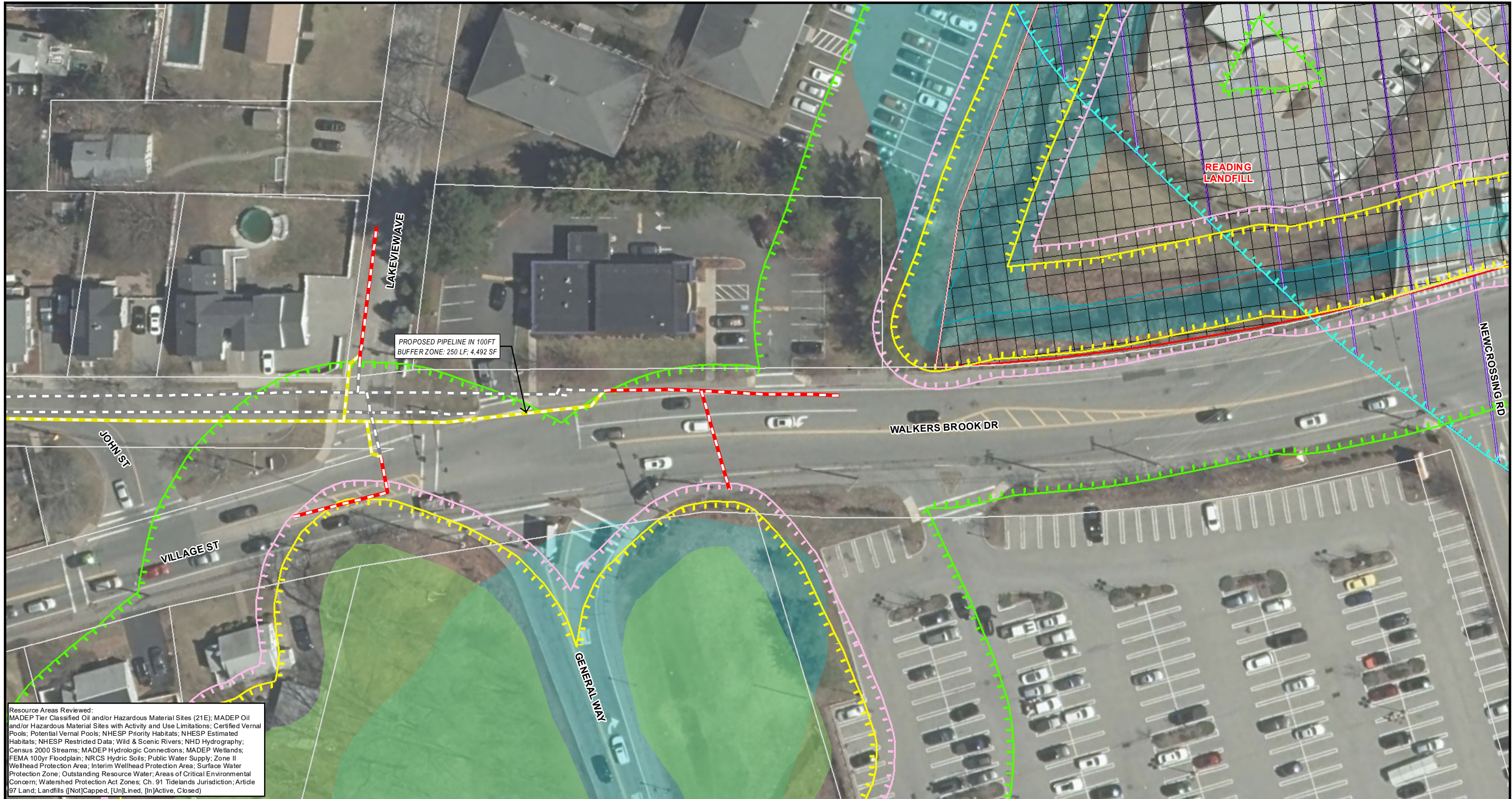
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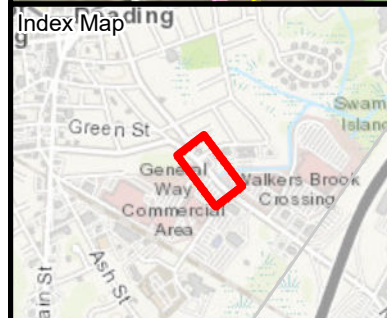
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JOHN STREET GAS MAIN REPLACEMENT
USGS Site Location Map
Reading, MA

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Resource Areas Reviewed:
 MADEP Tier Classified Oil and/or Hazardous Material Sites (21E); MADEP Oil and/or Hazardous Material Sites with Activity and Use Limitations; Certified Vernal Pools; Potential Vernal Pools; NHESP Priority Habitats; NHESP Estimated Habitats; NHESP Restricted Data; Wild & Scenic Rivers; NHD Hydrography; Census 2000 Streams; MADEP Hydrologic Connections; MADEP Wetlands; FEMA 100yr Floodplain; NRCS Hydric Soils; Public Water Supply; Zone II Wellhead Protection Area; Interim Wellhead Protection Area; Surface Water Protection Zone; Outstanding Resource Water; Areas of Critical Environmental Concern; Watershed Protection Act Zones; Ch. 91 Tidelands Jurisdiction; Article 97 Land; Landfills ([Not]Capped, [Un]Lined, [In]Active, Closed)



Legend

Existing Gas Main	200ft Riverfront Area
Proposed Gas Main	FEMA 100yr Floodplain*
Existing Gas Main to be Abandoned	Closed Landfill
MADEP Wetlands*	Parcel Boundaries
25ft Zone of Natural Vegetation	
35ft No Structure Zone	
100ft Buffer to Wetlands & Streams	

1 inch = 50 feet
 0 25 50
 Feet

*Indicates Layers Set to Transparency

JOHN STREET GAS MAIN REPLACEMENT

Environmental Resources Map

Reading, MA

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community