

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

<b>In the Matter of:</b>	)	
	)	
<b>Department rulemaking establishing</b>	)	
<b>Requirements for Uniform Natural Gas</b>	)	<b>Docket No. D.P.U. 16-31-B</b>
<b>Leaks Classification</b>	)	<b>October 24, 2017</b>

**COMMENTS OF THE WELLESLEY NATURAL RESOURCES COMMISSION  
ON PROPOSED REGULATIONS ESTABLISHING REQUIREMENTS FOR  
UNIFORM GAS LEAK CLASSIFICATION**

**I. Introduction**

The Wellesley Natural Resources Commission submits these comments on the Department of Public Utilities’ Proposed Regulations Establishing Requirements for Uniform Natural Gas Leaks Classification in the above-captioned docket. We request that DPU specifically define gas leaks in the root zone of a tree as a probable future hazard to property under Grade 2 as defined in proposed 220 CMR 114.04(3)(b), and that DPU recognize that damage to trees from gas leaks has a significant adverse environmental impact in the context of Grade 2.

**II. Statement of Interest**

The Wellesley Natural Resources Commission (“NRC”) is a five-member elected board established by Wellesley Town Meeting in 1978. The NRC is charged with the statutory responsibilities of *Park Commissions, Conservation Commissions, Tree Wardens, Shade Tree and Pest Control Officers, and Town Forest Committees* under Massachusetts General Laws Chapters 40, 45, 87, 131 and 132. The elected board operates with a small staff directed by a certified arborist, and we work closely with the

Wellesley Department of Public Works to oversee the use, preservation, and protection of the town's parks and conservation areas, and all public shade trees.

The NRC has a significant interest in the regulations being proposed by the Department of Public Utilities to identify specific criteria to define gas leaks that have significant environmental impact, and to establish a plan to expeditiously repair those leaks.

### **III. Gas Leaks and Public Shade Trees in Wellesley**

In recent years, the members of the NRC board and many other residents in our town have become increasingly alarmed by the ever-present smell of gas in Wellesley. The smell is so common that Wellesley residents have become inured to it. We smell gas everywhere we go, whether we are idling our cars at a traffic signal, walking our dogs, or taking our children to school. With the recent release of data on gas leak locations by National Grid and mapping of that data by Home Energy Efficiency Team (HEET), we have learned just how pervasive the gas leaks are: In an analysis of data reported by National Grid to DPU for 2016, HEET found 193 unrepaired gas leaks in our town of only 10.49 square miles.<sup>1</sup>

On March 21, 2017, the NRC organized a Public Forum on Gas Leaks in Wellesley, which was co-sponsored by the Wellesley Board of Selectmen, State Representative Alice Peisch, State Senator Cynthia Creem, State Senator Richard Ross, Wellesley Sustainable Energy Committee, Wellesley Health Department, and Sustainable

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<sup>1</sup> Map of gas leaks in Wellesley  
<http://wellesleyma.gov/DocumentCenter/Home/View/1087>

Wellesley.<sup>2</sup> Attendance at the forum reached the room capacity of 185 at the Wellesley Free Library, demonstrating the level of public concern over gas leaks in our town.

Among the issues discussed at the forum was the well-documented effect of gas leaks on trees, whereby the oxygen in the soil is displaced and tree roots are eventually suffocated.

Public shade trees are a subject of particular pride in Wellesley. In June 2017, Wellesley was awarded the Arbor Day Foundation “Tree City USA” designation for the thirty-fourth consecutive year. Any resident may contact the NRC to request the installation of a free public shade tree under our tree program in order to help maintain the town’s tree canopy. We currently have a waiting list of 133 residents who have requested a public shade tree. In 2016, the NRC and the Wellesley Department of Public Works allocated \$57,000 for our town-wide tree planting and watering program; \$48,000 for maintenance of public trees; and \$124,000 for tree removal.

With more information available to us on specific gas leak locations, the NRC has begun to gather data on the correlation between the leaks in our town and the die-off of our treasured public shade trees. Anecdotally, our tree maintenance crew has been noticing this correlation for many years, notably along Weston Road where we have lost many pine trees in close proximity to known gas leaks. Tree crews have observed that after years of being weakened and damaged by long exposure to gas leaks, many public shade trees must be removed to avoid the risk of falling on people, homes, and other private property. We recently commissioned Gas Safety Inc. to conduct a survey of gas leaks in the town, along with some spot-checking for leaks where public shade trees have

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<sup>2</sup> Wellesley Media video of Public Forum on Gas Leaks in Wellesley, March 21, 2017 <http://vp.telvue.com/preview?id=T01662&video=307977>

recently been removed. In one particularly dramatic example, gas was detected from a hole in the stump of a public shade tree that had just been removed at the intersection of Belair and Birch Streets. The gas was coming up right through the tree stump. We have not yet completed our analysis of our gas leaks survey, but we have observed that of the 1475 public shade trees that have been removed since 2004, at least 110 were located within 25 feet of the top 10 percent highest volume leaks detected. Many more trees were removed within 50 feet of a gas leak.

We are deeply alarmed by the clear implication that we are losing mature trees because of gas leaks. These trees represent a vital part of our town's character and provide incalculable environmental and health benefits to the town, in addition to representing a significant investment of tax dollars over many years. Without action on the part of the DPU, this devastating loss is likely to continue as National Grid does not place a priority on the repair of leaks near trees and has no incentive to accelerate these repairs. Our town will be forced to continue the heartbreaking and Sisyphean task of maintaining and replacing trees that are being killed by leaking gas. We urge you to incorporate gas leaks in the root zone of a tree in the Grade 2 classification of gas leaks as a probable future hazard to property.

#### **IV. Incorporation by reference comments of the Emerald Necklace Conservancy**

The Wellesley Natural Resources Commission concurs with the extensive comments submitted by the Emerald Necklace Conservancy, and we incorporate by reference as though they are our own the comments in Section III, Trees as valuable property; Section IV, Environmental significance of Trees; Section V, Requested changes to the proposed regulations; and Section VI, Conclusion.

**V. Conclusion**

We appreciate this opportunity to provide comments on these regulations, and we thank you for your consideration.

Respectfully submitted,

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Raina McManus, Chair

Date: October 24, 2017

Wellesley Natural Resources Commission

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