

From: noreply@noreply.mass.gov
To: [SitingBoard Filing \(DPU\)](#)
Subject: EFSB Permitting Reform Comment Form
Date: Monday, May 19, 2025 7:59:29 PM

Name

Benny Upton

Email

[REDACTED]

I am a...

Member of the public

Are you commenting on a straw proposal?

Yes

If yes , which one?

Standard Applications

Comment/Question

To Whom It May Concern,

I am submitting comments in response to the "Cumulative Impacts Analysis" session and the associated straw proposal regarding the siting of Battery Energy Storage Systems (BESS).

As a member of Empower Brighton and Allston, a grassroots organization dedicated to safe and sensible development, I want to emphasize the severe fire safety risks associated with large-scale battery installations in dense residential neighborhoods.

We have seen from real-world incidents—including examples like the proposed Electric Avenue site—that when these systems fail, the result is often a large-scale, uncontrollable fire. These are not typical fires. Fire departments refer to the necessary tactic as "surround and drown"—requiring enormous volumes of water, extended response time, and an acceptance that the system must largely burn itself out. In these scenarios, entire buildings are lost, toxic fumes may be released into the surrounding air, and the risks to firefighters and residents alike are immense. You cannot account for every weather and wind scenario so please do due diligence when considering locations for these types of green energy solutions. There is absolutely a way to protect health and life safety of citizens today and the promise of a healthy environment for the citizens of tomorrow.

The proximity of these units to residential buildings dramatically increases the potential for loss of life, long-term environmental harm, and displacement. These are not theoretical risks—they are documented realities from other jurisdictions that have seen BESS-related fires.

In response to the straw proposal:

1. Are the proposed evaluation criteria appropriate?

NO. The current criteria fail to fully address fire and life safety risks, especially in urban settings where evacuation is more complex and fire spread is faster.

2. Are there criteria that should be applied to certain types of infrastructure and not others?

YES. Immutable setbacks from residential property lines must be established and mandated for all BESS. Without hardline buffer zones, we are placing lives—especially those of first responders and nearby residents—at unacceptable risk.

Life safety must be the guiding principle. Firefighters deserve the ability to defend life and property without facing overwhelming risk from toxic, high-heat, extended-duration fires. Residents deserve to live without fear of industrial-level hazards being placed just feet from their homes.

Thank you for the opportunity to submit these comments, and I urge you to revise the siting guidelines with these critical safety issues in mind.

Sincerely,
Benny Upton