



May 25, 2025

Andy Greene, Energy Facilities Siting Board (EFSB)  
Rick Collins, Department of Energy Resources (DOER)  
EFSB/DOER Siting Staff

RE: Siting of Energy Storage Systems

Dear Mr. Greene, Mr. Collins, and Siting Staff,

I am writing to submit comments for your consideration regarding the siting of energy storage systems in Massachusetts.

While numerous factors must be considered when establishing regulations for these vital components of our clean energy future, one issue stands out as critically important: Battery Energy Storage Systems (BESS) must not be sited in wellhead protection areas, watershed protection zones, or in any location where public drinking water supplies could be compromised by a catastrophic event such as fire, lightning strike, vandalism, or other disasters.

The protection of clean, abundant drinking water is paramount. Wellhead protection areas are designated precisely to safeguard this essential resource. These areas are identified and regulated through detailed hydrogeological studies that define “zones of contribution” to water supplies. Activities within these zones are carefully limited to prevent contamination risks.

Unfortunately, current siting regulations do not prohibit BESS facilities from being placed in these sensitive areas. In fact, a developer has recently proposed an 8-megawatt BESS within Zone II of the primary water supply for the Town of Orange, less than a mile from the Quabbin Reservoir watershed. Although our Planning Board rightly rejected this proposal, the developer is now suing the Town. As a result, we are forced to divert scarce municipal resources to defend our public water supply.

Our concerns are grounded in real and growing risks. While BESS fires are not common, they are notoriously severe when they occur. The environmental and health impacts are not yet fully understood, but we do know that lithium battery fires release toxic substances. The Material Safety Data Sheet (MSDS) for lithium fluoride, a likely byproduct, identifies it as hazardous and advises against groundwater contamination.

Both the EPA and MassDEP are currently evaluating the risks of exposure to lithium compounds.

Our estimates indicate that extinguishing a fire at the proposed BESS site would require 1.3 million gallons of water, which would inevitably infiltrate the aquifer, carrying harmful contaminants directly into the public water supply. The resulting toxic smoke also presents serious threats to residents, emergency responders, and the environment.

Moreover, the site lacks adequate water resources for fire suppression of this magnitude. There is no immediate access to a river or lake, and the well cannot produce more than a limited percentage of the required water. We would rely on water tankers and mutual aid from neighboring towns, all while contending with traffic disruptions along heavily traveled Route 202.

Our well currently provides 70% of the Town's water supply. If it becomes contaminated, we have no guaranteed alternative. While we maintain an Emergency Response Plan, we do not have the capacity to recover from a disaster of this size in a timely or affordable way.

This is not just a local concern. It is a scenario that any community with a public water supply could face. If we fail to enforce protective boundaries for our most vital resource, what purpose do these delineations and regulations serve?

We urge you to amend siting regulations to explicitly prohibit the placement of BESS facilities and any other hazardous infrastructure in wellhead protection areas and water supply watersheds.

Thank you for your attention to this critical matter.

Sincerely,

Jane Peirce, M.S., R.S.

Member, Orange Selectboard

Member, Orange Board of Health