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Wednesday, May 21, 2025

To: DPU, EFSB, OEJE, EEA and DOER
RE: Stakeholder Session #4 on Site Suitability and Cumulative Impacts Analysis

I appreciate the opportunity to offer comments regarding the Site Suitability proposals presented at the May 5, 2025, Stakeholder Session in Holyoke MA. I appreciate the state's agencies efforts in conducting these productive stakeholder sessions and inviting public feedback.

I offer the following comments from session #4:

- I share the concerns raised about the use of lithium-ion batteries in BESS facilities, as mentioned during the May 5 session in Holyoke, MA. I urge the state agencies to reconsider this option and explore safer, more sustainable alternatives. As was mentioned, there are safer alternatives that need to be investigated. We should not trade fossil fueled environmental hazards for another potential hazard in the form of lithium-ion BESS facilities. From origination to destination, **Our Local Solutions Should Not Contribute To Negative Environmental Impacts Globally**!

  (1) An article in **The Republican** on March 27, 2025, page B4, reported the concerns of a group of Umass scientists about the global impact of lithium ion batteries. *"New research led by the University of Massachusetts Amherst scientists debunks commonly accepted models used to estimate available water for lithium mining —and found the mining to have significant environmental effects."*[1]

  (2) "*Lithium batteries are very difficult to recycle and require huge amounts of water and energy to produce. Emerging alternatives could be cheaper and greener."*[2]

  (3) There are pros and cons presented by: **"Battery Chemistry Research: Safer, Sustainable Alternatives to Lithium-Ion Batteries for Energy Storage."** [3]

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[1] **New UMass research may upend mining industry essential for batteries** by Juliet Schulman-Hall. https://www.masslive.com/news/2025/03/new-umass-research-may-upend-mining-industry-essential-for-batteries.html ; https://www.umass.edu/natural-sciences/news/boutt-overestimation-fresh-water-lithium-mining

[2] https://www.bbc.com/future/article/20240319-the-most-sustainable-alternatives-to-lithium-batteries

[3] https://www.gftinc.com/blog/battery-chemistry-research-safer-sustainable-alternatives-to-lithium-ion-batteries-for-energy-storage/

(4) "*Lithium-ion (Li-ion) batteries have become indispensable in our technology-driven world, playing a crucial role in furthering sustainable energy solutions…However, producing lithium-ion batteries presents substantial challenges. The finite nature of lithium resources raises concerns about sustainable supply as demand escalates."*[4]

(5) It has been said that technology is dictating a demand for energy that may be unsustainable in the years to come. Climate solutions that could potentially place future generations and their environment at risk need to be carefully and thoroughly reviewed. There needs to be a balance.

- To preserve and protect our natural world for future generations, we must consider conservation. While investing in clean, renewable energy facilities to meet the growing demand for energy is important, we also need a comprehensive plan that focuses on energy efficiency and encourages conservation. This can be achieved by educating and informing the public about ways to reduce their energy usage.

- Community engagement, cumulative impact analysis, and responsible siting are crucial components of these proposals. However, past experiences with community outreach and cumulative impact analysis have sometimes been disappointing. Underserved neighborhoods have often been overlooked. On the positive side, the new proposals regarding outreach appear to be a step in the right direction. With improved oversight and follow-up, I hope they will be implemented as intended.

- I share many of the same concerns expressed by stakeholders regarding the need to meet energy goals without harming our wetlands, forests, water supplies, and natural habitats. Clearing forests and using protected farmland for solar installation should not be considered. Additionally, BESS facilities should absolutely not be located over or near aquifer zones or secondary recharge areas.

- I strongly advocate for a process that involves local governments and the affected populations in discussions before, during, and after siting projects. Community engagement at the state and local levels is crucial for successfully and equitably achieving these climate goals. Residents express concerns that the proposed processes may favor applicants over their concerns.

- Is there a clear plan for the disposal of decommissioned solar and battery storage facilities? Is there a plan in place to recycle and repurpose their parts? As we transition to renewable energy as a solution to a sustainable energy future, it's crucial to implement it responsibly and equitably. This approach should avoid creating an environmental burden for future generations to fix or clean up.

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[4] https://greenly.earth/en-us/blog/industries/sodium-batteries-a-better-alternative-to-lithium

- Providing conditions for the construction of renewable energy facilities is one aspect, but oversight and enforcement are equally crucial to ensure that no unvetted project, regardless of its size, goes unnoticed and receives approval without careful application of these proposals.

- It was encouraging to hear the numerous comments, concerns, and questions from the participants in these sessions. While I acknowledge the state agencies' intention to achieve these climate goals within a "fast timeline," I sincerely hope that the suggestions and concerns raised by the public will be carefully, thoughtfully, and comprehensively considered as the agencies proceed with finalizing these proposals.

Thank you, for your time and attention to these comments.

Respectfully submitted,

Mary Ann Babinski
Concerned Citizen, former City Councilor, EJ Advocate