

# The Commonwealth of Massachusetts

## MASSACHUSETTS SENATE

### SENATOR JO COMERFORD

Hampshire, Franklin and Worcester District

STATE HOUSE, ROOM 410  
BOSTON, MA 02133-1053  
TEL. (617) 722-1532  
WWW.MASENATE.GOV

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SENATE COMMITTEE ON STEERING AND POLICY

27 May 2025

### ***Re: Senator Jo Comerford Comment on Site Suitability***

I want to begin by acknowledging that nearly half of the Cumulative Impact Analysis, Site Suitability and General comments have been submitted by residents living in the Hampshire, Franklin, Worcester district. This demonstrates the deep concern that my constituents have about energy infrastructure siting, given that western and north central Massachusetts are ground zero for ground-mounted solar and battery storage proposals.

This concern is also evident in my [comment from one year ago to the Commission on Energy Infrastructure Siting and Permitting](#), which led with support for site suitability guidance that protects our natural and working lands.

My concern and the concerns of my constituents about losing natural and working lands to energy infrastructure are well documented. Site suitability criteria should prioritize the carbon storage and sequestration, resilience, and biodiversity value of parcels of land.

Further, the site suitability criteria must also consider groundwater and drinking water.

In 2024, New Leaf Energy proposed locating a battery energy storage facility in the Town of Wendell, selecting the location because it was “[adjacent to existing electrical infrastructure](#),” without considering the site’s proximity to an aquifer that the Town relies on for drinking water. New Leaf eventually [withdrew](#) its proposal, but not before residents mobilized to form No Assault and Batteries, Wendell. These constituents have submitted [site suitability comments](#).

Recently, a developer proposed a battery energy storage facility near to the primary water supply for the Town of Orange, and less than a mile from the Quabbin Reservoir watershed. Orange Selectboard and Board of Health member Jane Pierce [commented](#):

*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.*

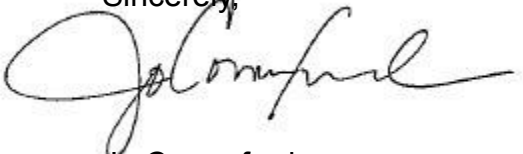
*Moreover, the site lacks adequate water resources for fire suppression of this magnitude. There is no immediate access to a river or lake, and the well cannot produce more than a limited percentage of the required water. We would rely on water tankers and mutual aid from neighboring towns, all while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

A [comment](#) from Shutesbury constituent Michael DeChiara notes that in Amherst, the Atkins reservoir, which supplies drinking water to UMass Amherst, is just downstream from a proposed 19-acre solar installation with energy storage.

All of these comments, as well as others, speak to the importance of considering ground water and drinking water as key site suitability factors.

I have also reviewed and endorse the site suitability comment being submitted by The Nature Conservancy.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jo Comerford', with a large, stylized initial 'J'.

Jo Comerford  
**State Senator**

*Hampshire, Franklin, Worcester district*