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Dear Members of the Massachusetts Executive Office of Energy and Environmental Affairs,

I would like to submit these comments for consideration regarding your published document on "Site Suitability Assessments for Clean Energy Infrastructure". My comments are focused on the safety of our "Drinking Water Supply", section "Di".

As a volunteer elected member of the Shutesbury Planning Board, I am part of the regulatory body charged with reviewing development projects. I am part of our team that is responsible for protecting the public health, safety and welfare of our town.

Section "Di" In your draft guidance publication of "Site Suitability Assessments for Clean Energy Infrastructure" is on Drinking Water Supply. I believe that this section is dangerously incomplete. A very high degree of protection for our public and private drinking water is absolutely essential. Energy Storage Systems with lithium batteries (which I believe are now required under SMART 3.0) should not be sited where they could endanger the drinking water of Massachusetts residents. The safety of our "Drinking Water Supply" should be greatly elevated in importance when you finalize your site suitability scoring.

We are one of the eight towns that borders the Quabbin Reservoir, one of the largest mostly unfiltered water supplies in the United States. The Quabbin is the drinking water for approximately 3 million people in our state including the greater metropolitan Boston area. Being part of the Quabbin watershed means that we have both surface and ground water flowing from our town into the Quabbin. The trees of our 90% forested town help to clean and purify the Quabbin's water. My great concern is the very high potential for both ground and surface water contamination flowing into our ground water or the Quabbin or Atkins reservoirs caused by an unexpected spontaneous fire consuming the lithium batteries in large Energy Storage Systems which are now part of any significant solar array.

An extensive study published by the American Chemical Society <https://pubs.acs.org/doi/10.1021/acs.est.2c08581> shows that extinguishing water from lithium-ion batteries produces significant concentrations of nickel, cobalt, lithium, manganese and fluoride which show a high toxicity towards the tested aquatic species. In addition, PFAS (or forever chemicals) are usually part of the actual lithium batteries, so when they spontaneously catch on fire they will release PFAS chemicals both into the air and the ground water. In 2023 a lithium battery in a single Tesla car battery spontaneously burst into flames and required 6000 gallons to put it out. The size of lithium batteries needed for a "Small Clean Energy Storage Facility" go up to rated capacity of 100

megawatts. Lithium batteries in even a "Small Clean Energy Storage Facility" are potentially up to 1000 times larger than the Tesla battery that took 6000 gallons to extinguish. <https://www.nbcnews.com/business/business-news/tesla-car-battery-fire-needed-6000-gallons-water-to-extinguish-rcna68153>

The National Fire Protection Association (NFPA) just announced that their theme for Fire Protection Week on October 5-11, 2025 is on lithium-ion batteries. This was not an arbitrary decision by their more than 50,000 members. Last year the largest ever lithium storage system fire in the U.S. occurred at Moss Landing in California. It burned for several days. In 2023 there were two large lithium-ion fires that burned for multiple days within one week of each other in New York. It is horrifying to contemplate the ecological and financial disaster if many thousands of gallons of toxic water from a lithium-ion battery fire were allowed to flow from our town into the Quabbin or Atkins Reservoirs or into our ground water aquifers.

Currently in Shutesbury we have at least one site of oil and PFAS contamination that has entered our aquifers. The number of wells that are now contaminated and the radius of the contaminated area are both expanding. So far, the town of Shutesbury has spent close to \$ 700,000 to help mitigate this issue. <https://amherstbulletin.com/2025/06/11/area-communities-in-quabbin-watershed-including-belchertown-pelham-and-shutesbury-unite-in-demand-for-more-support-from-state-for-ongoing-sacrifice-61517652/>

When underground aquifers are contaminated, we do not know where the contaminated water will flow. When private wells are contaminated, our residents have no alternative public water supply. It is just too dangerous to place large lithium batteries over our aquifers. It is also too dangerous and perhaps even catastrophic to place large lithium batteries in our 90% forested town because we make up part of the Quabbin watershed. Lithium batteries could also contaminate the Atkins Reservoir that supplies water to the University of Massachusetts. To help mitigate the dangers of lithium battery fires, the New York City Department of Environmental protection has purchased or protected over 156,350 acres in the Catskills watersheds since 1997 to protect their drinking water. It is an area larger than all the land in Brooklyn, Queens, the Bronx and Manhattan combined. The Massachusetts Department of Energy should make sure that we have a similar level of protection for the Quabbin.

<https://www.nytimes.com/2025/05/04/realestate/nyc-land-catskills-watershed.html>

The potential costs of water filtration and purification if the Quabbin were contaminated are not available. However, we can get some idea of the potential costs by looking at the public water supply of New York City which is also largely unfiltered. In 2018 an article published in the New York times estimated that it would cost more than 10 billion dollars to build a massive filtration plant and at least another 100 million annually on its operation if all the New York City water needed to be filtered due to contamination.

<https://www.nytimes.com/2018/01/18/nyregion/new-york-city-water-filtration.html?smid=url-share>

Until recently, our town of Shutesbury was being sued by Cowls, the largest private landowner in Massachusetts and PureSky. PureSky is a private for-profit international consortium of funds managed by Fiera Capital Corporation and the Palisade Infrastructure Group. The attorneys of Cowls and Puresky were using the outdated 1985 law (that House Bill 2312 would replace) and the state's lack of clear solar array and lithium battery site suitability guidance in their lawsuit against our town. Cowls and Puresky submitted plans that would affect approximately 360 acres of our forested land, according to documents filed with our Conservation Committee. The trial date was set for November 4, 2025. Please see the article published below on June 30, 2023.

<https://theshoestring.org/2023/06/30/solar-company-sues-shutesbury-over-solar-zoning-bylaw/>

Puresky and Cowls recently withdrew their lawsuit in part due to the uncertainty of the environmental regulations that your department and our state legislature are presently writing into guidance and codifying into law. Cowls, Puresky and our two attorneys agreed to execute a stipulation of a dismissal of the case against Shutesbury without prejudice. This of course means that Puresky and Cowls can refile their law suit at any time. I do believe that they and perhaps other for-profit companies are waiting to see the final draft of your "Site Suitability Assessments for Clean Energy Infrastructure" before making that decision.

<https://gazettenet.com/2025/08/25/shutesbury-developers-agree-to-drop-suit-over-zoning-bylaws/>

A report published on Oct. 23, 2023 from the scientists of the Massachusetts Audubon and the Thompson Lab at Harvard Forest “offers the first-ever comprehensive economic and geospatial analysis of whether Massachusetts can meet its solar goals while protecting its most valuable natural and working lands.” Please see the article cited below.

<https://harvardforest.fas.harvard.edu/news/new-report-examines-mass-forests-and-solar-siting-offers-path-net-zero-goals>

Using the findings of their combined study, the Harvard Forest and Audubon published the below cited article “Growing Solar, Protecting Nature” to show how “Massachusetts can meet its solar goals while protecting its most valuable natural and working lands”.

<https://storymaps.arcgis.com/stories/932be293f1af43c8b776fdad24d9f071>

The Audubon also published the summary article cited below showing how protecting our natural and working lands from development is a critically important strategy in our response to the climate crisis. One of the Key Findings of this report is that clear cutting forests is actually counterproductive to our goal of reducing the concentration of carbon dioxide in the atmosphere.

<https://www.massaudubon.org/our-work/publications-resources/growing-solar-protecting-nature>

I lived in the Boston area for about 10 years in the 1970s and 80s. Four of those years were spent at Tufts University where I majored in Biology and studied Ecology including Ecosystems, Conservation and Forest Ecology as well as Aquifers. Six of those years I was a science teacher at Brookline High School. I never thought about the water that I used both in Medford and Brookline and how it originated from the Quabbin. As a 32-year resident of Shutesbury and as a volunteer elected member of our Planning Board, I can now tell you with all certainty that the safety and purity of the water from the Quabbin that is really the life blood of Boston is not at all guaranteed.

Several months ago, several members of the Shutesbury Planning Board, our attorneys and the attorneys of Puresky met in Springfield with a retired judge who acted as a mediator in attempt to avoid a court date. During our mediation meeting we had the opportunity to carefully examine their 5 large proposed solar and lithium battery storage sites in our 90% forested town. Upon reviewing one of the heavily forested sites (that was to contain large lithium storage batteries) I remembered that it had a small tributary that led right into the Atkins Reservoir which provides water to the University of Massachusetts and the town of Amherst. Once the map was enlarged at my request, I was able to point out the tributary that could possibly bring toxic waste from the thousands of gallons of water needed to put out a lithium battery fire right into the Atkins Reservoir. I was able to identify this small tributary because I have walked through these woods for over thirty years. This example illustrates why in addition to your strict siting guidelines of solar arrays and lithium batteries, the passing of House Bill 2312 is also so very important. We need local Planning Boards who know the land and tributaries to continue to regulate solar development including industrial sized lithium-ion storage units which have the potential of posing significant risks to the public health, safety and welfare of our citizens. This time, the law suit against our bylaws was dismissed without prejudice. This time, Puresky and Cowls were prevented from clear cutting 100s of acres of our forested land and putting up large lithium batteries in our forested land. Next time, with their large team of attorneys and their nearly unlimited resources, they very well might be successful.

We need your assistance to help us to protect our water supply as well as the water supply of the Quabbin and Atkins Reservoirs. We have a total populations of 1721 people including children. 51% of our roads are unpaved and we have no industry or stores to support our tax base. We recently spent many tens of thousands of dollars from our limited tax base to pay attorneys to defend ourselves from the law suit filed against our town's bylaws that received near unanimous approval at our annual town meeting. Although the law suit filed by Cowls and Puresky has been withdrawn, I fully expect that it will be refiled in the future depending upon what you write in the final draft of the "Site Suitability Assessments for Clean Energy Infrastructure". For the time being, we have delayed their plans to build 5 large solar arrays with large lithium battery storage systems in our town which is part of the Quabbin and Atkins watersheds.

Energy Storage Systems with lithium batteries should not be sited where they could endanger the drinking water of Massachusetts residents. I strongly believe that energy storage systems should not be placed above aquifers or near public or private drinking water supplies. It is just not possible to protect water supplies when lithium fires occur. The safety of our "Drinking Water Supply" should be elevated in importance when you finalize your site suitability scoring. Please incorporate in your draft document on "Site Suitability Assessments for Clean Energy Infrastructure" under "Other Considerations of Note" additional protections for towns that are 100% dependent on groundwater aquifers. Considering the absolute importance of the Quabbin Reservoir to the vitality of Boston, the protection of the Quabbin Reservoir should certainly be included in your "Other Considerations of Note". I believe that it is essential that you also provide additional protections in your "site suitability scoring" for the 8 towns that make up the watershed of this extremely valuable and vital Quabbin Reservoir.

Please make it possible for our Planning Board to protect our water supply and the water of the Quabbin and Atkins Reservoirs. We want to continue to be the stewards of our aquifers as well as the Atkins Reservoir and the Quabbin Reservoir that supplies clean high quality mostly unfiltered water to the 3 million people in the greater metropolitan Boston area.

Thank you for your understanding and support.

Jeff Weston