ADVOCATES FOR CONSERVATION OF OAKHAM'S RURAL NATURE & SAFETY, INC.

c/o 640 Scott Road • Oakham, MA 01068



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June 2, 2025

To the Members of the Massachusetts Energy Facilities Siting Board

Commonwealth of Massachusetts **Energy Facilities Siting Board** One South Station Boston, MA 02110 sitingboard.filing@mass.gov

RE: Docket # EFSB25-07

Dear Members of the Board:

We are writing to express our strong opposition to the project associated with docket number EFSB25-07. As concerned residents, we believe that this project poses significant risks and challenges that warrant careful consideration.

Environmental Impact

The proposed project threatens to disrupt local ecosystems, potentially causing irreversible harm to natural habitats and water supply. Massachusetts has made commendable strides in promoting sustainability and environmental protection, and approving this project would undermine those efforts. The site chosen for development is in the Ware River Watershed, and abuts land owned by the Department of Conservation and Recreation (DCR).

The DCR website proudly states:

"DCR owns approximately 23,000 acres in the Ware River watershed. Located in Central Massachusetts between the Quabbin Reservoir and the Wachusett Reservoir, the Ware River Watershed is the land and water which drains to the MWRA diversion facility on the Ware River in Barre. The water that enters the intake travels to either the Quabbin or Wachusett Reservoir through an underground tunnel, the Ouabbin aqueduct. The watershed includes some or all of Barre, Hubbardston, Oakham, Phillipston, Princeton, Rutland, Templeton, and Westminster".

In addition, DCR states:

"The primary purpose of DCR watershed lands is drinking water supply. Public access, therefore, is carefully regulated and controlled to protect over 3 million people's source of drinking water. State regulations require all entry and exit through gates or other designated areas only. Anything that could pollute the water supply system, such as litter or refuse of any sort, is prohibited. (emphasis added) Please observe restrictions on recreational activities. Direct water contact activities, such as swimming and wading, are strictly prohibited by regulation".

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In view of these restrictions, it is beyond comprehension that anyone can think of locating a BESS, with their history of unextinguishable fires, in this location. There are no easily accessible roads in that DCR property. In the event of a fire, fire trucks would not be able to access the vast acreage. Do not forget the loss of lives, the devastation of miles of forest land, and loss of homes caused by wildfires in California in 2024. In addition, the project will have a continuous negative effect, both during construction and while in operation, on air quality, as well as noise and light pollution. All these issues will have long-term consequences for our community, several neighboring communities and the three million Massachusetts residents whose drinking water is supplied by the Quabbin and Wachusett Reservoirs.

On April 19, 2019 an explosion occurred at the McMicken Battery ESS in Surprise, Arizona. Four career fire fighters were severely injured. Even after five years of advances in lithium battery technology, the incidence and risk associated with BESS fires and thermal runaway still exists. The recent BESS fire at Moss Landing, Monterey County, California in January 2025 is an illustration of the lack of safe technology. As quoted in the New York Times on February 10, 2025, "Last month a battery-storage plant went up in flames and burned for days, prompting the evacuation of more than 1,000 residents and shutting down local schools. The plant, located in Moss Landing, an unincorporated community in Monterey County, is the largest facility in the world that uses lithium-ion batteries to store energy. Residents have reported feeling ill, and many of them worry that the fire polluted the air, soil and water with toxins". The long-term effects of the toxic fumes and heavy metals released during this disaster are not yet known. We cannot ignore the reality that the technology for a safe BESS does not yet exist.

Community Concerns

The residents of affected areas have voiced legitimate concerns about the impact this project will have on their quality of life. Noise and light pollution, and the potential health hazards linked to the facility's operations are grave issues that cannot be ignored. The petitioner listed four possible locations in this petition. In the three other locations, the petitioner considered the effect on the residents in those locations. However, in our Oakham location, there is a glaring omission of residents even existing. This BESS would be located in a rural, residential neighborhood, surrounded by forests. The proposed site is only 2,112 feet from the elementary school; only 4,224 feet from the center of town with buildings that house our Highway, Police and Fire Departments, the Town Hall and Town Library, a church and an exempt Group Home. To further insult the residents of Oakham, the petitioner held an informational meeting in the town of Barre, not in Oakham, and invited only abutters to the property. The petitioner's lack of transparency, and failure to involve local communities in the decision-making process has left many feeling unheard and dismissed, which contradicts the principles of fair public representation.

Economic Considerations

While proponents of the project often highlight potential economic benefits, such as energy production, it is imperative to weigh these against the costs borne by local residents. The long-term economic burden of environmental degradation and decreased property values far outweighs the short-term gains. Oakham is a small rural town with a population of 1932. There are 697 residential homes all zoned as agricultural. Oakham already operates on a limited budget. The decrease in property values in the immediate area of the

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BESS and, in fact, throughout the town, will result in a significant loss of real estate tax income for the town. The lost revenue will financially devastate the already cash-strapped town. It is reasonably foreseeable that the town will no longer be able to afford or provide its current limited municipal services and unable to contribute its share to the Quabbin Regional School District and Pathfinder Regional Vocational Technical High School District. The Town of Oakham will need financial assistance from the State and will need to avail itself to all State and Federal laws available as remedies to continue operating.

Alternative Solutions

In light of these concerns, we urge the Board to explore alternative solutions that align with the state's green energy goals. Investments in truly sustainable and innovative technologies can achieve the intended outcomes without compromising the well-being of our environment and communities. As an example, in Everett, Massachusetts a new BESS is being constructed by Trimount. This development will transform approximately 20 acres of the idle 100-year-old former oil terminal site. This is an appropriate setting. A rural residential neighborhood is not.

Conclusion

We respectfully request that the Massachusetts Energy Facilities Siting Board reject the proposal under docket number EFSB25-07. The potential risks far outweigh any purported benefits, and it is our collective responsibility to protect Massachusetts's environment, communities, and future generations. We trust the Board will carefully consider these points and act in the best interest of our town and the state. We trust the Board after hearing and evaluating all the credible evidence will conclude that this location does not provide an equitable distribution of environmental burdens and benefits; and the proposed use of the particular parcel is not reasonably necessary for the convenience of or welfare of the public.

Thank you for your attention to this matter.

Respectfully,

Aaron Langlois, RN, MBA

Co-chair, Strategy & Government Affairs

Advocates for Conservation of Oakham's Rural Nature & Safety, Inc. (ACORNS)

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