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## TOWN OF SOUTHAMPTON

Donna C. Sharkey, Hearing Officer  
Energy Facilities Siting Board  
Department of Public Utilities, Siting Division  
One South Station  
Boston, MA 02110

Dec. 16, 2024

Subject: Petition of Westfield ESS LLC, D.P.U. 24-151

Dear Ms. Sharkey:

The Town of Southhampton appreciates the opportunity to comment on this project. This is a significant project potentially impacting not just Westfield but the region. It is widely recognized and accepted that Battery Energy Storage Systems (BESS) are needed to support the move to a more sustainable electric grid.

While we support the development of BESS facilities, we feel it is essential that they be sited, developed, and managed consistent with the need to protect vital local and regional natural resources. In this regard, we offer the following comments on the submission.

We are particularly concerned with any project which has the potential to do damage to the regional water supply.

We note that the project is not compliant with the Westfield Zoning Ordinance for a number of reasons. The incompatibility which is most concerning is that the project site includes a portion of the City's Water Resource Protection District which does not permit a BESS.

The stated purposes of this district are

*“to promote the health, safety and general welfare of the community; to protect, preserve and maintain the public water supply and the lands that contribute to it; to conserve the natural water resources within the City; and to prevent the pollution of the public water supply of the City and surrounding areas.”* (Section 3-170, Westfield Zoning Ordinance)

There is a good reason for that prohibition. As the Ordinance suggests, this aquifer serves a wide area – not just Westfield – but many portions of many communities including Southhampton. It is vital that all communities contributing to the aquifer take measures *“to protect, preserve and maintain the public water supply and the lands that contribute to it”*.

Officials throughout the region have repeatedly taken measures to ensure that there is regional cooperation to protect our shared water supply.

Neither the Risk Assessment or Hazard Mitigation documents appear to have addressed the potential impact on the regional aquifer. We note that the petitioner states none of “the BESS units, the Project Substation or any other electric components, including the proposed transmission lines” will be located within the Zone II Wellhead portion of the district (pages 32 and 34 of the D.P.U. 24-151 Petition). However, they don’t specify or suggest the separation distance between such facilities and the Zone II boundary. Given that the project’s stormwater facilities are in part located within the Zone II area, one must assume that they are located in close proximity. The stormwater system could readily serve as a conduit for transmission of contaminated stormwater. (The provision of a shut off diversion valve to be manually operated in the event of an emergency such as a thermal runaway event is not comforting.)

We urge the DPU to require the applicant to revise their analysis and plans to address the project’s location within the aquifer protection district. These revisions should specify the separation distance between each of the project facilities and the Zone II boundary.

The applicant (Prefiled Testimony of Dan Watson) has indicated that they have engaged in considerable public engagement for at least 2 years within the City of Westfield. However, the aquifer to be impacted by this project serves a broader region. The Town of Southamptton has concerns about uses allowed within or in close proximity to the aquifer recharge area. In prior discussions, we have heard from other communities (such as, City of Holyoke, City Westfield, etc.) of similar concerns, Therefore, the Town has engaged with the PVPC to work on the framework for aquifer protection within the broader regional community.

Ideally, this application would be held until the region has developed a consensus on how to best regulate land uses potentially impacting the aquifer recharge area. We accept that such a hold could pose significant hardships on the applicant since it is unclear how long it would take to reach a consensus. However, at a minimum, the applicant needs to engage with the communities who are served by the aquifer. Thus, the application should be placed on hold unless and until the applicant has engaged with the broader regional community which depends on the aquifer. This engagement should be in a manner similar to that used to engage the Westfield community – with their experience we are certain such engagement can be undertaken much quicker than it took in Westfield.

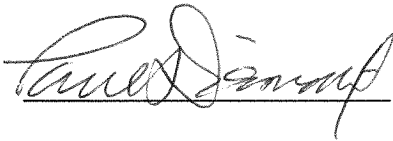
The Emergency Response document and discussion within the petition focus on coordination with the Westfield Fire Department. Given the project’s potential impact on the broader regional community and the mutual assistance provided by each of the region’s communities to each other, the coordination needs to extend beyond the limits of the City of Westfield. Similarly, training provided to emergency responders should extend beyond the limits of the City of Westfield.

In summary, this project has the potential to adversely impact the region's water supply for decades. Therefore, we ask the DPU, before acting on the petition:

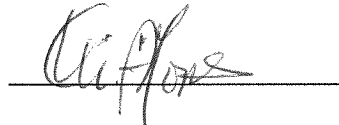
- 1) Require the applicant to provide more data as to the separation distance between each of the project facilities and the Zone II boundary.
- 2) Require the applicant to revise the Community Risk Assessment and Hazard Mitigation analysis to address the project's location relative to the aquifer protection district.
- 3) Require the applicant to engage with the broader regional community, which depends on the aquifer in a manner similar to that undertaken within the City albeit on a reasonably compressed time frame.
- 4) Revise the Emergency Response Plan and related representations to provide for engagement with area emergency responders.

Again, thank you for the opportunity to offer input into this project. I am hopeful that a reasonable approach can be undertaken to see that this or a similar project can be undertaken in the area without risking our vital water supply.

Sincerely,



Paul Diemand, Chair  
Planning Board



Christine Fowles, Chair  
Select Board

Cc:

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2099 Pennsylvania Ave, NW  
Washington, DC 20006

Southampton Planning Board file  
Southampton Select Board file