Citizens Opposed to Extensions of 27 & 150

c/o Barry C. Cosgrove

49 Blackmore Pond Circle

West Wareham, MA 02576

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Michael King

Chair, Planning Board

Town of Wareham

Marion Road

Wareham MA.

Kenneth Buckland

Planner

Town of Wareham

Marion Road

Wareham MA.

Re: 27 Charge Pond Road, Case 7-20 & 150 Tihonet Road, Case 9-20

Dear Wareham Planning Board:

The pending requests to resuscitate the expired and flawed approvals of the massive forest clearing, land alteration, and resulting multiple battery energy storage systems at 27 Charge Pond Road and 150 Tihonet Road should be denied without further delay.

Neither of these projects received the legal, regulatory, and scientific scrutiny now required of current-day large-scale solar projects with battery systems. Consequently, fair play, the health, safety, and welfare of Wareham citizens, and the protection of our sole source aquifer warrant that these projects be required to file entirely new applications.

The projects, as previously approved, would have mistakenly allowed for the decimation of approximately 100 acres of forest land to house multiple battery energy storage systems on top of our sole source aquifer in a residentially zoned area. The projects are also adjacent to significant and environmentally critical water bodies, with some of the proposed battery systems immediately next door to one of our Town's little league baseball fields and the heavily occupied Wareham YMCA. Hundreds upon hundreds of visits by children, adults, employees, and vendors occur at these locations – particularly at the YMCA. These approvals, therefore, were not only unwise in the first place but are now especially unsuitable given the enormous gamble associated with multiple battery systems.

Just down the road (0 Route 25), a single battery storage system was very recently, and justifiably, denied. Infusing new life into the subject projects - with multiple battery storage systems – would be strangely contradictory (and arguably disparate treatment).

This is especially so given that this body is presently contemplating a moratorium on all such battery systems until it can better understand all the risks involved.

Furthermore, and for a good reason, this body is presently drafting an entirely new zoning bylaw provision specific to high-risk battery storage systems for possible consideration at a future Town meeting, perhaps as early as this Fall.

It would be profoundly illogical to look the other way on expired approvals involving a handful of unpredictable - and in some cases uninsurable battery systems – while simultaneously advocating for a ‘time out’ on all such systems – for everyone else.

If the principle is that battery storage systems are presently too risky, such a principle should be uniformly implemented. This is another way of saying - that this decision must be entirely without politics and with indifference to who serves as the landlord of the expired subject projects. Applicants should be treated equally. No landowner/applicant is entitled to an advantage over any other. (A worry made more legitimate by the ‘open mic’ afforded to the applicants during meetings on this topic while the public – in contrast - is forbidden to speak).

And what about cumulative risks of the other battery energy systems already in place – all of which also benefited from a legacy ‘review lite’? We presently have more potential battery bombs in our Town than we have public schools. Thus, the cumulative risk is a compulsory consideration that would be forgone by – yet again – giving these projects a pass.

And let there be no doubt – the applicant's offer to increase the once ridiculously insufficient decommissioning amounts tied to these projects does nothing to ameliorate the risks and costs (environmental especially) that could result from the failure of any of these ill-suited battery systems.

The applicant’s failure to obtain an interconnection agreement is the sole basis of its supposed ‘good cause’ claim for an extension. But since when is the poor planning of an applicant more compelling than the protection of the kids at the YMCA and the water we drink?

Additionally, these projects' legacy approvals needed more consideration of our sole source drinking water aquifer. The project approvals lacked any installation of protective monitoring wells or the conduct of any hydrology study (a la Fearing Hill).

Instead, only stormwater run-off calculations appear to have been performed, using – likely - outdated precipitation data that fails to consider climate change impacts. And these calculations were conducted long before the new Town By-Law compelling more sophisticated stormwater study requirements for projects of this nature. Just the same, the fire department’s review of these projects was limited only to access to the sites and not to detailed rescue and firefighting methods and plans.

The credibility of this body's above-described good faith efforts to better protect our Town, as demonstrated by the possible new battery-specific bylaw and a possible proposed moratorium on such systems, would be materially undermined by endorsing any previously flawed battery project approval.

Please reject the extension requests without further delay. Continuing to enable the applicant’s delay strategy is tantamount to providing the applicants with an extension in perpetuity.

For The Citizens Opposed to Extensions of 27 & 150

 /s/ Barry C. Cosgrove