Comments Regarding Site-Suitability Criteria for Clean Energy Infrastructure

The Wendell citizen group No Assault & Batteries (NAB) has previously submitted fifty recommendations regarding site-suitability criteria. These were prepared before the straw proposal was made available. We are also in general agreement with the thoughtful comments submitted by Michael DeChiara, Planning Board Member in the town of Shutesbury.

Drawing on these and other sources, NAB strongly supports the following recommendations regarding the site-suitability standards to be developed by the Executive Office of Energy and Environmental Affairs in accordance with the 2024 Clean Energy Act, which requires that the Commonwealth avoid, minimize, or mitigate negative "impacts of siting on the environment, people and goals and objectives of the commonwealth for climate mitigation, carbon storage and sequestration, resilience, biodiversity and protection of natural and working lands to the extent practicable."

- **In order to maximize energy efficiency and minimize waste, large electric power generation and storage facilities should be located close to population centers and industrial end-users, not in sparsely populated rural areas.**
- **A single, publicly available "go" and "no-go" map of potential sites would reduce unnecessary development review and help alleviate concerns about loss of home-rule authority.**
- **Land designated as Core Habitat or Critical Natural Landscapes on the latest version of BioMap should be ineligible for energy siting. State forests and parks, municipal conservation lands, and wildland reserves regardless of ownership should all be off limits, as should prime farmland and critical watershed areas that provide safe drinking water to the residents of Massachusetts through public water systems or private wells. Exceptions should be allowed for clean energy infrastructure located on buildings or parking areas within these otherwise ineligible areas.**
- **Since state-wide GIS resources are necessarily relatively coarse grained and lacking in fine detail, on-the-ground verification for each proposed site should be required. This could be an important role for local Conservation Commissions.**
- **Battery storage must be attached to a solar installation on the same parcel in order to receive zoning exemptions provided by Chapter 40 A, section 3.**
- **Proposals for energy infrastructure projects on low-suitability sites must include alternative sites with significantly higher scores.**
- **The straw proposal interprets the term "resilience" as a matter of ensuring that additional energy infrastructure should avoid flood zones and areas subject to rising sea levels, but this interpretation is far too cramped and narrow. Resilience means the ability to bounce back after a**

disturbance, such as a major grid outage that may arise from extreme weather events or other causes. The hallmark of resilience is redundancy, and the legislative mandate to incorporate resilience into the site-suitability framework should be understood as guaranteeing that every town maintains some critical level of energy functionality in the face of a major grid failure.

- **Resilience places a premium on distributed energy resources that allow towns a measure of of self-sufficiency in the face of a significant outage. This should include, for example, safe buildings where residents could escape dangerous weather extremes of heat or cold, receive up-to-date information about the crisis, and charge their personal batteries to permit sheltering at home.**
- **The straw proposal suggests that "future carbon storage potential will be estimated from modeled future carbon sequestration in biomass and soils on the site over a period of 30 to 50 years", but this is woefully inadequate. While some form of modeling is required to estimate sequestration potential, a period of 3 to 5 decades is way too short. A typical forest in the state is 70 to 80 years old, and it would require at least that long to restore the status quo ante following decommissioning and even longer to restore soil structure, carbon content, and biodiversity.**
- **The notion that "Suitability scores may be adjusted upward in specific instances where energy infrastructure projects are expected to result in habitat benefits (e.g. transmission or distribution corridors that would maintain open grass/shrub habitat)." is simply ludicrous. Massachusetts already has an abundance of early successional habitat and rewarding developers to create more makes no sense. What are genuinely rare and in need of protection are old growth forests and intact mature forests that are allowed to reach that vanishingly rare condition that was once the predominant vegetation of New England.**
- **The highest site-suitability scores should apply to sites on already disturbed or developed lands, such as brownfields, landfills, parking lots, or roofs and south facing walls, i.e. sites that do not reduce natural and working lands and their potential for carbon capture and storage, biodiversity protection, and agricultural productivity.**
- **Although not a strictly site-suitability issue, energy infrastructure projects should be evaluated across their entire life cycles, including not only the energy they are expected to generate, store, transmit, or distribute but also in terms of the emissions and environmental degradation attendant upon the production of raw materials, manufacturing, site preparation, construction, and transport throughout the process from site selection to ultimate decommissioning, material recycling, and site restoration.**
- **Our wildlands are not for sale, and their loss cannot be mitigated by any monetary consideration alone. Mitigation fees make no sense in this context unless they are explicitly designated for permanent wildland reserves to allow ecological healing and recovery far into the future.**
- **Developers may determine their own site-suitability score as part of a filing protocol, but these preliminary scores require verification. Final scoring should be done by independent third party experts hired by the state, but paid for by the developer.**

- **Energy infrastructure development should not be allowed on low-quality sites simply because it is more convenient or profitable for the utility; such considerations have nothing to do with site suitability.**
- **Social "benefits" such as job creation or recreation opportunities should not be included in site-suitability scores. Developers should not be able to increase their site-suitability scores by offering goodies in other areas.**
- **If a project has a low site-suitability score, a permitting body should be within its rights to deny the project, and waivers should not be allowed.**
- **Sites may be suitable for certain technologies but not others, and the health, safety, and welfare consequences of different technologies must be considered. Large lithium ion battery energy storage systems, for example, should not be located near fire-prone areas because of the risk of thermal-runaway events, nor should such developments be permitted in areas lacking adequate fire-emergency response capacity. Under such circumstances, developers should be required to provide more appropriate alternative site and/or technology options, even if they are more expensive.**
- **The overall approval process should incorporate local public opinion; projects should receive a boost if local people favor the project and a decrement if they oppose it.**

Evidence-based studies by Mass Audubon, Harvard Forest, and DOER have shown that Massachusetts has plenty of suitable sites for clean energy infrastructure to meet its climate goals without further sacrificing natural and working lands. The siting and permitting process must ensure that these critically important lands receive the protection they deserve and the people of Massachusetts require for their ongoing well-being in the face of climate disruption, biodiversity loss, and water cycle degradation.

Submitted by:
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