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To: [SitingBoard Filing \(DPU\)](#)
Subject: Stakeholder Comments on Cumulative Impacts Analysis and Site Suitability Criteria for Clean Energy Infrastructure
Date: Tuesday, May 27, 2025 2:03:42 PM

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Dear Siting Board,

Please accept the following comments and recommendations regarding the proposed energy siting regulations and guidelines currently under development by the Energy Facilities Siting Board (EFSB) and the Department of Public Utilities (DPU):

1. Siting for “Small” Energy Projects and Energy Storage Systems (ESS):
All small-scale energy projects and battery-based ESS installations should be limited to the built or previously disturbed environment. This recommendation aligns with the findings of Growing Solar, Protecting Nature (Mass Audubon and Harvard Forest), which provides a path for achieving Massachusetts’ clean energy goals while preserving critical natural and working lands.
2. Exclusion Areas for Generation and Transmission Projects:
Large- and small-scale energy generation and transmission projects should be categorically excluded from the following areas:
 - Article 97 protected open space, including:
 - DCR state parks and reservations
 - State forests and watershed lands
 - Division of Fisheries and Wildlife management areasAn exception may be appropriate for solar canopies over impervious areas, such as beach parking lots.
 - Wetland resource areas as defined under 310 CMR 10.04, including a 1,000-foot setback from identified wetlands.
 - Properties listed in the State Register of Historic Places (950 CMR 71.03), unless approved by applicable regulatory authorities.
 - Areas identified in Massachusetts BioMap2 as Critical Natural Landscapes, Core Habitats, Important Habitats, or Priority Habitats.
 - Outstanding Resource Waters and other classified wetlands or river systems.
 - FEMA-designated flood plains and other flood-prone areas.
 - Lands supplying public drinking water.
 - Prime farmland, as defined by state criteria.
3. Deforestation and Forest Protection:

Ground-mounted solar arrays should not be permitted on lands deforested within the past five years. This recommendation is consistent with the findings of the Healey Administration's Carbon Forestry Committee, which emphasized forest retention as a key carbon sequestration and climate mitigation strategy.

4. Marginal Farmland Protection:

Siting should avoid reducing agricultural productivity on marginal farmland. These areas should be minimally impacted, preserving existing agricultural uses wherever possible.

5. Protection of Environmental and Cultural Values:

Siting and project design should ensure no adverse impacts on:

- Native biodiversity, including all species listed under the Massachusetts Endangered Species Act
- Permanently protected open space
- Native American cultural and historical areas, as defined by Indigenous peoples of Massachusetts

6. Local Authority and Discretion:

Municipalities must retain meaningful authority and discretion over project siting through provisions that:

- Allow adoption of locally enforceable safety and emergency response standards for battery storage systems
- Permit local planning boards and commissions to define and enforce siting goals and capacity limits based on town-specific criteria
- Authorize towns to reject minimization or mitigation proposals deemed to endanger the health, safety, and welfare of residents or to threaten valued environmental or cultural resources.

Thank you for the opportunity to provide these comments. I urge the Board to adopt regulations that reflect a balanced, conservation-forward, and community-centered approach to clean energy development in the Commonwealth.

Sincerely,

Carl Schulz

, Massachusetts