

**From:** [Carol Walker](#)  
**To:** [SitingBoard Filing \(DPU\)](#)  
**Subject:** Stakeholder Comment  
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To the Energy Facilities Siting Board,

Please accept my comments relating to energy siting regulations and guidelines that are in development:

1. "Small" energy projects and all ESS battery systems shall only be allowed on the built or disturbed environment.

The MA Audubon Harvest Forest study (2023) proved that Massachusetts can get all the solar we need this way, without clearing forests or taking over farmlands that we need for food. 85% of Massachusetts residents strongly favor getting the solar we need from rooftops, parking lots and other disturbed land. Forests are a critically needed, irreplaceable resource for a great many benefits towards a healthy environment and ecosystem, and they store an enormous amount of carbon. Even the Healy administration's Carbon Forestry Committee concluded in a report that we should not be converting forested land for energy production. "Reduce unnecessary forest land conversion via collaboration across state agencies and complementary infrastructure and actions (e.g. solar facilities, power lines, highways, housing, or other development)...forest conversion on any given acre results in more carbon loss than harvesting on average, is more permanent, and also results in the loss of all other forest benefits."(Page 48)

- 2) The following areas shall be excluded from large and small energy generation and transmission projects:

- Article 97 protected open space (note: If Article 97 land is categorized as an ineligible area, an exception for solar canopies - e.g., solar over a DCR beach parking lot- shall be considered.)
- Wetland resource areas (310 CMR 10.04) and with setbacks of 1,000 feet to identified wetlands resources.
- Properties included in the State Register (950 CMR 71.03), except as authorized by regulatory bodies
- BioMap 2 Critical Natural Landscape, Core Habitat, Important Habitat, or Priority Habitat
- Outstanding Resource Waters, wetlands or rivers
- Flood plains or flood prone areas
- On land that provides public drinking water
- On prime farmland (as defined by the state)

- 3) Ground-mounted solar projects shall not be allowed on newly deforested land, defined as cleared less than 5 years ago.

- 4) Marginal farmland shall be minimally impacted with no decrease in agricultural productivity.

- 5) Language should be included that ensures no negative impacts on:

- Biodiversity including plants and animals listed under the Massachusetts Endangered Species Act
- Protected open space
- Native American cultural areas as determined by Massachusetts' Indigenous people

- 6) Power of discretion and authority shall be provided to the towns that allows for:

- Locally generated enforceable safety standards for battery storage
- Town-specific capacity and siting goals, with local control of siting
- Authority for municipalities to reject any proposal for minimization and/or mitigation that are deemed a threat to the towns' health safety and welfare, and natural and cultural resource protections, as determined by local boards and commissions.

Sincerely yours,

Carol Walker, a grandparent concerned for a healthy environment and a Mothers Out Front member



