

From: [Carolyn GMail](#)
To: [SitingBoard Filing \(DPU\)](#)
Subject: Stakeholder Comments
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To the Energy Facilities Siting Board,

My name is Carolyn Stabilo and I'm a resident of Hampden, Massachusetts. 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.

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.

A 2023 study from Massachusetts Audubon and Harvard Forest states that Massachusetts can build the required solar facilities on the current built environment, without the need to lay waste to forests, natural and working lands.

The 2024 Healey Administration's Carbon Forestry Committee report concluded that we should not be converting forested land for energy production. In fact on page 48 of the report, on page 48, says the following: "...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 other forest benefits." (<https://www.mass.gov/doc/forests-as-climate-solutions-climate-forestry-committee-report-final/download>)

As stated above, there's documented evidence the Commonwealth can achieve our ambitious energy goals, while also protecting our delicate ecosystems. A balance must be reached that allows rural towns like ours the ability to regulate these facilities, while also ensuring that the past mistakes in solar development won't continue to be repeated.

I respectfully request these comments be considered and implemented moving forward.

Sincerely yours,

Carolyn Stabilo

Carolyn Stabilo

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