

May 18, 2025

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Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Boston, MA 02114,

Please accept these comments on the Site Suitability Methodology for Clean Energy Infrastructure Straw Proposal.

CISA strengthens farms and engages the community to build the local food economy. We work closely with farms and local food businesses in Hampden, Hampshire, and Franklin counties. In 2024, we provided promotional and/or technical assistance services to nearly 500 farms or local food businesses.

We support EEA's proposed inclusion of agricultural production potential to the siting suitability methodology, despite its omission from the 2024 Climate Law. Local agriculture and local food production are important to Massachusetts' climate resilience, and as noted in the Straw Proposal, "farmland is an essential, limited, and diminishing resource for Massachusetts' local food economy." We recommend weighting this criterion in the scoring system, so that its importance cannot easily be offset by other factors, such as proximity to utility infrastructure.

Agriculture in Massachusetts is diverse and productive agriculture takes place on a variety of soil types and locations; EEA should consider broad soil criteria for scoring, such as "Soils of Local Importance" and the location of existing farms. In addition, dual use solar, which is still experimental and has not demonstrated strong potential across multiple agricultural sectors, should not be assumed to assure ongoing productive value.

Carbon storage and sequestration are essential to climate mitigation, and our understanding of the best ways to store carbon continues to increase. Scoring criteria should allow for new information about practices and locations that maximize carbon sequestration.

Thank you for your careful review of these comments.

Sincerely,

Margaret Christie
Special Projects Director