From:	connie glore
To:	SitingBoard Filing (DPU)
Subject:	Stakeholder Comments on Cumulative Impacts Analysis and Site Suitability Criteria for Clean Energy Infrastructure
Date:	Tuesday, May 27, 2025 4:27:23 PM

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Dear Siting Board,

Please incorporate my recommendations regarding proposed energy siting regulations and guidelines that are in development by the Energy Facilities Siting Board (EFSB) and Department of Public Utilities (DPU):

1) "Small" energy projects and all Energy Storage System (ESS) battery systems should only be allowed on the built or disturbed environment. Massachusetts can meet its solar goals while protecting its most valuable natural and “working” lands.

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

- Article 97 protected open space, including all Department of Conservation and Recreation state parks and reservations, state forests, watershed forests, and all Division of Fisheries and Wildlife state wildlife management areas. Exceptions should be considered for solar canopies, such as solar panels over a public beach parking lot.
- “Wetland resource areas” (under 310 CMR 10.04), including setbacks of 1,000 feet from identified wetlands resources.
- Properties included in the State Register of Historic Places (950 CMR 71.03), except as authorized by regulatory bodies.
- Areas identified as Massachusetts BioMap 2 Critical Natural Landscapes, Core Habitats, Important Habitats, or Priority Habitats.
- Areas classified as Outstanding Resource Waters, wetlands or rivers.
- Flood plains or flood-prone areas.
- Lands that provide public drinking water.
- Prime farmland (as defined by the state).

3) Ground-mounted solar projects should not be allowed on recently deforested land, defined as lands cleared less than 5 years ago. Keeping forests as forests is important in reducing carbon loss and mitigating climate change.

4) Marginal farmland should be minimally affected, with no decrease in agricultural productivity.

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

- Native biodiversity, including native plants and animals listed under the Massachusetts Endangered Species Act.
- Protected open space.
- Native American cultural areas determined by the Indigenous people of Massachusetts.

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

- Locally created and 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 is deemed to be a threat to the health, safety, and welfare of town citizens or to the protection of natural and cultural values in the town, as determined by local boards and commissions.

Thank you for the opportunity to comment on the proposed regulations and guidelines.

Sincerely,
Connie Glore
[redacted]