

**From:** [David Gross](#)  
**To:** [SitingBoard Filing \(DPU\)](#)  
**Subject:** Comments on solar and battery storage installation regulations  
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Dear Energy Facilities Siting Board,

Kindly consider my comments below relating to energy siting regulations and guidelines that you are developing.

Most importantly, the built environment should be fully developed with solar installations before the natural environment is disturbed. Factories, parking lots, and homes do not actively sequester atmospheric carbon. Forests and agricultural fields do. It makes zero sense, other than saving money for the solar developer, to destroy carbon-sequestering locations in favor of already built-upon locations. The Commonwealth alone has tremendous solar development potential along the right of way of the Mass Pike. Why in the world would you want to cut down forests and disturb their ecology when you have acres of available land along the pike? Why would you want to put solar panels over agricultural land that can provide food when acres of parking lots are available for solar fields?

The regulations that you are developing should prioritize solar installations on the built environment and on areas of fallow, passive use such as highway rights of way. The regulations should strongly penalize any solar installations on carbon-sequestering and ecologically sensitive undeveloped land such as forests and agricultural lands. It would be shameful to blight wild lands for future generations to save money for solar developers. If a developer wants to clear cut forest land or panel over farm fields, they should get permission only with a high, permanent tax on the operations of the solar systems paid to local communities that are damaged by the loss of productive and ecologically sensitive areas. They further should be required to completely remediate all damage done to the local ecosystem at any point during construction, operation, and decommissioning of the solar array to return the work area to its previous state.

As to large battery storage systems, they must not be allowed within water resource areas and critical, core habitats. Wetlands resources must be protected. Further, any such systems must be placed in areas that are readily accessible to fire suppression resources, and any locale that can be potentially impacted by a runaway battery fire must be provided with full protection fire departments trained and equipped to deal with lithium battery storage system fires.

The bottom line for your regulations and guidelines should be first, do no harm, and second, account for local impacts. Only then should commercial interests be allowed to install solar arrays and/or battery storage systems. Local commissions, regulations, and community members must be given substantial voice in any siting decisions for these systems.

Sincerely yours,

David Gross  
Pelham, Massachusetts