

**From:** [Doone](#)  
**To:** [SitingBoard Filing \(DPU\)](#)  
**Subject:** Stakeholder Comments on Energy Facilities Siting  
**Date:** Tuesday, May 27, 2025 10:14:23 PM

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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:

I have been watching in dismay as prime meadow land and forests here in western Massachusetts are turned into solar panel fields, for several years. I strongly believe that rooftops and parkinglots and similar sites already denatured, and closer to power users, are far more appropriate places. Landfills make sense too, and I've been glad to see a couple of those near by - (though I worry that they are treated with herbicides, where I would far prefer grazing as the primary vegetation treatment.)

I have been quite worried that the push for state level siting approval would mean that corporations would be able to force poorly thought out installations onto highly inappropriate rural sites, simply because it's cheaper and easier, if you disregard the degradation of our natural environment.

I'm quite grateful to Responsible Solar MA for putting together the well thought out comments below. I fully support all these restrictions and adjustments:

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.

Sincerely yours,  
Doone MacKay

A solid black rectangular box used to redact the signature of Doone MacKay.