

**From:** [John Holden](#)  
**To:** [SitingBoard Filing \(DPU\)](#)  
**Subject:** Public Comment on Consolidated Permitting  
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To the Members of the Energy Facilities Siting Board:

I appreciate the opportunity to comment on the implementation of Chapter 239 of the Acts of 2024, especially the development of the consolidated permitting process for large clean-energy infrastructure. I support a strong transition to renewable energy but urge the Board to adopt regulations that safeguard local input and prevent unintended harm.

Preserve a meaningful local voice.

I understand that (under G.L. c. 164, § 69T), the EFSB may now issue a single “consolidated permit” that overrides all state, regional, and municipal approvals. I urge the Board to include, wherever legally possible, formal opportunities for municipal ratification or structured consent—especially for large, high-impact projects. Residents must retain a meaningful say in shaping their environment.

Avoid automatic approvals when information is incomplete.

The statute and proposed rules include “deemed granted” language if final decisions are not made within a fixed timeframe (15 months for EFSB projects, 12 months for municipal ones). Please incorporate mechanisms to pause these clocks when applicants fail to submit required information or materially revise plans. A rigid deadline should not reward incomplete applications.

Require binding, transparent community benefits.

Chapter 239 requires DOER and EEA to develop standards for environmental justice protections, cumulative impacts, and Community Benefit Agreements. I urge the EFSB to condition any consolidated permit on the presence of a public, enforceable benefit agreement and full evaluation of localized impacts—especially in overburdened communities.

Value careful deliberation.

Expedited permitting must not come at the expense of thoughtful planning. Around the world, we see that large infrastructure projects rushed through permitting—however well-intentioned—can have long-lasting negative effects. The Netherlands’ Delta Works, for example, was significantly improved by years of dialogue and design revision. Climate urgency is real, but good process produces better outcomes.

Uphold Massachusetts’ tradition of local self-determination.

While the EFSB operates under state law, it also represents the people of Massachusetts. Many towns that strongly support clean energy are rightly alarmed by the prospect of losing their ability to shape or reject large-scale development within their borders. I urge the Board to adopt rules that support—not suppress—local leadership.

Thank you for considering these comments as part of your rulemaking process. I will continue to follow the development of these regulations closely.

Sincerely,  
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