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Subject: Stakeholder Comments
May 27, 2025

To the Energy Facilities Siting Board,

My name is Joseph Graveline, I am a resident of Northfield Massachusetts. I have a small farm here in Northfield, 33 acres located on the Great Meadows and upper terraces abutting the Connecticut River. I have spent the last 53 years living on a farm and the last 38 years often working the land, always right on a major Navigable River of the United States. My connection with the land has always been up close and personal. I watch the environment change with the seasons and I have come to recognize the impacts of global warming and the transformative impact it has played out on farming and the natural environment.

Fifteen years ago I invested in solar to help with our energy needs and to play my small part in caring for the land and the environment. I'm a big fan of solar, however that being said I have seen the haphazard way the Commonwealth has relied on the Dover Amendment and the power of big money developers to push poorly thought out solar projects on to small rural towns including Northfield.

If you look at the names of the some of the CEO's of these big firms you will notice those same names are sitting on the working groups of Governor Healey's regulatory advisory boards for solar and battery energy storage systems. You will also see some of those same names on lawsuits filed against small towns for trying to control how solar and BESS projects are implemented in their communities. It seems "Dover" is a one sided cudgel and the Regulators are also the Regulated. The towns find it difficult to compete with the big money budgets of clean energy developers with our strapped financial resources.

Here is a list of my suggestions for solar build out and BESS regulation.

1. We need to allow small BESS and solar "By Right" projects to be built only on the disturbed not critical environments, and well away from wetlands and other sensitive properties.

Most especially with BESS systems considerations for aquifers and drinking water supplies for private citizens must be taken into account for the potential harmful impact of polluting these important non-renewable resources which affect the financial well being of home owners who use wells as their drinking water and utility needs.

2. Ground-mounted Solar projects shall not be allowed a newly deforested land, defined as cleared less than five years previously.

As solar panels are non-permeable surfaces and capable of redirecting the flow of water from high impact rain events, the possibility for erosion and habitat degradation and flooding can occur in the areas often associated with large tracts of newly cleared forest land.

3. Marginal farmland shall be utilized in a way that there is a minimal impact to the ability to farm, with no net loss in agricultural productivity. The 50% sunlight rule for dual use solar is a non-science or science fiction concept, asks any farmer.

As crop rotation has played an important role in Massachusetts in preventing the infestation of insects and diseases and has been so successful for the last 150 years, the ability to continue

practicing crop rotation is important as it impacts more than just the farmer who is doing it, impacts his neighbors farms as well.

4. It is important to create a set of guidelines that are common sense protections for land uses instituted in law, to allow land to be used in specific ways that protect the nature and character of those properties that exclude both large and small energy generation and transmission projects. Below is a list of just such commonsense protections.

- * Article 97 protected open space with this note: (if Article 97 land is categorized as an ineligible area, an exception for solar canopies, as in a system over a DCR parking lot shall be considered.)
- * Near wetland resources areas as listed under (310 CMR 10.04) with setbacks of 1000 feet to identified wetland resources.
- * Properties included in the State Register of Historic Places (950 CMR 71.03), with the exception as authorized by regulatory bodies, and in communication with indigenous historians and keepers of the ancient knowledge, as articulated in the March 21, 2023 Advisory Council on Historic Preservation (ACHP) guidelines.
- * BioMap 2 Critical Natural Landscape, Core Habitat, Important Habitat, and or Priority Habitat.
- * Outstanding Resource Waters, wetlands, or rivers.
- * Floodplains or flood prone areas.
- * On lands that provide public drinking water.
- * On prime farmland (as defined by the state), which is often located on FEMA and other flood plains or flood areas.

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

- * Biodiversity including plants and animals listed under the Massachusetts Endanger, Species Act.
- * Protected Open Space.
- * Native American cultural areas as determined by Massachusetts Indigenous Peoples including both Federally and State recognized tribal peoples and cultural NGO's

6. The power of discretion and authority shall be provided to the towns that allows for:

- * locally generated enforceable safety standards for Battery Energy Storage Systems (BESS)
- * Town-specific capacity and citing 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 town's health, safety and welfare and natural and cultural resource protections, as determined by local boards and commissions.

Sincerely yours,

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