

May 19, 2025

Executive Office of Energy and Environmental Affairs
Office of Environmental Justice and Equity
Energy Facilities Siting Board
Department of Energy Resources
Comments submitted electronically to:
Sitingboard.filing@mass.gov

Dear Secretary Tepper,

Thank you for the opportunity to provide comments on the Site Suitability Methodology for Clean Energy Infrastructure Straw Proposal issued by the Executive Office of Energy and Environmental Affairs (“EEA”) pursuant to the 2024 Climate Law.

Kearsarge Energy (“Kearsarge”) is a solar and energy storage developer and owner-operator based in Boston, Massachusetts with a focus on serving public entities in the Commonwealth with affordable, local, and reliable energy. Kearsarge owns and operates over 70 solar and energy storage projects in MA totaling 140 MW. We have developed Massachusetts projects since the inception of the SREC I program and remain deeply committed to developing, owning, and operating solar and energy storage projects in the Commonwealth.

Kearsarge recommends that the final Site Suitability Criteria exclude agricultural production potential. Kearsarge understands the importance of productive farmland as a resource to the Commonwealth, and we do not believe that renewable energy development reduces the viability of farmland. Renewable energy projects are a unique form of development: they can be operated and decommissioned without compromising the agricultural viability of land. Furthermore, if a landowner does not want to stop farming while a renewable project is operational on their land, they can co-locate agricultural operations and renewables in an agrivoltaics model or farm a portion of their land while siting a renewable energy project on the remainder. These approaches offer important financial diversification and flexibility to Massachusetts farmers.

Agricultural production potential is also not required as part of the site suitability methodology under the 2024 Climate Law. Because renewable energy can be sited on farmland without decreasing the viability of farmland as a resource, and because requiring this criterion would go beyond EEA’s statutory mandate, we recommend that the final criteria not include agricultural production potential.

Best regards,



Sam Feigenbaum
Director of New Markets and Senior Counsel

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