

From: [You Are ABuddha](#)
To: [SitingBoard Filing \(DPU\)](#)
Subject: Formal Written Comments to Siting Board regarding Straw Proposals
Date: Thursday, May 22, 2025 5:44:00 PM

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Good Evening,

My name is Lara Wahl, and I live at [REDACTED]. I am representing comments from myself, Eli Elkus, Zuleica Booth, and Martina Booth- who live at the same address.

I have not only read through your Straw Proposals, but I have attended 3 Stakeholder Sessions, 2 virtual, and the one in Holyoke regarding Site Suitability and Cumulative Impacts Analysis, in person. I have given some oral comments and hope they will be considered. I am also including some other formal written comments below. If we must stick to the format of commenting to your specific proposals then I shall comment on the proposal entitled Cumulative Impacts Analysis and Site Suitability Criteria.

At these sessions we have learned that the target **for 2025** was to procure about **4,470 megawatts of solar-** and that we have met that target for 2025.

It is important to note that it is generally accepted that **1 megawatt of solar is derived from the equivalent of 5 - 10 acres of land coverage.**

1. My first comment is that I think it is important that the board establish metrics moving forward- to inform the public, just how much land we are talking about that needs siting for the proposed renewable energy infrastructure to come. When you talk in megawatts it's easy to glaze over what we are actually talking about doing to our communities. These metrics when talking about land conversion should be in acreage, square miles, football fields, something feasible to consider.

Even if we take the more conservative number of **5 acres per megawatt, 4,470 megawatts is equivalent to AT LEAST 22,350 acres of solar across our state that we have already procured. (Or double that if we are using the 10 acres per megawatt figure.)**

Harvard and the Audubon Society has said that **60% of the solar installed** (on the last 8,000 acres in the last 10 years- which is the only amount they specifically studied when they were concerned about land conversion for solar) has been done so **on FORESTED land**. Much of which was forest ZONED land which afforded it absolute protections against clear-cutting except in the case of solar apparently. <https://storymaps.arcgis.com/stories/932be293f1af43c8b776fdad24d9f071>

At your meeting sessions you have revealed that the state are **looking to almost double that 22,350 acres to roughly 44,700 or more acres of solar from 4,470 megawatts to 8,360 megawatts**

just in the next 5 years, or 89,000 acres if using the larger 10 acre per megawatt figure.

"Net zero" by 2050 means you are **looking to procure 27,000 mega watts or 27gw+ (note the plus) that would be 135,000 acres!! by 2050. OR if you go with the less conservative figure of 10 acres per megawatt- we are talking about 270,000 acres of land across the state converted for solar. And this is just solar, not to mention battery storage facilities.**

Just to give some context for us to make sense of this incredibly large number of acreage-we have **351 towns in Massachusetts/** that means the governor thinks this board should seek to accomplish (what seems to be a fool's errand) that each and every town should have **384 acres paved in solar. (Or 768 acres of solar if you calculate this using the 10 acres per megawatt formula) Or about 300 football fields back to back. Or about 600 football fields, back to back. Every town.** This sounds ludicrous does it not? When you break it down into actual area concerned here that you must site and account for? And when you start saying in your proposals that even our precious INELIGIBLE areas of core habitat can be waived past, not to mention the hundreds of thousands of acres of Critical Landscape areas that are apparently on the table for the right price- this proposal is nothing short of disgusting and irresponsible, if I may speak frankly. If we are to set an example for the rest of the country, clear-cutting our precious forests is not the precedent we want to set for the renewable energy future, don't you agree?

SO I ask you formally:

1. Stop talking in megawatts, but rather in square area, or acreage, or any feasible comprehensible metric of land mass so that the public can be made informed as to what we are actually talking about doing here, first and foremost.
2. Forest land should be without a doubt OFF the table if we are actually getting real about renewable energy conversion. If you can't see that, then all is lost. I have colleagues that I am sure will go into the science and details of this point per nauseum about not just the carbon sequestration but on how FORESTS are ESSENTIAL to help cool the planet and regulate rain cycles etc. So how can we pretend we are achieving some net zero goal to help regulate the planet by destroying hundreds and thousands of acreage of forest zones in critical landscape areas?

And if you can't see this, then realize at least with all the bad press on the gross mismanagement of this "clean energy" transition between projects getting cancelled left and right by mutinous towns not wanting the destruction of our precious forests lands, that the public will simply not allow the massive clear-cutting of more of our forests. If you think the PROGRESSIVE state of Massachusetts is going to roll over and allow this, then you can't be serious about your goals.

Solar should be allowed on "built-environment only," period. Forest ZONED lands shall not be touched.

If you insist on having this in your language than: In terms of "Ineligible Areas" YOU must add **"Critical Natural Landscape"** to your list of Ineligible Areas in addition to:

" BioMap Core Habitat or Priority Habitat • Article 97 protected open space² • Top 20% of forests for carbon storage statewide • Wetland resource areas (310 CMR 10.04) 2 If Article 97 land is categorized as an ineligible area, an exception for solar canopies (e.g., solar over a DCR beach parking lot) should be considered. Commonwealth of Massachusetts Executive Office of Energy and Environmental Affairs"

Where your bio map shows a lighter green area for "critical Natural Landscape" in terms of my town of Shutesbury- ALL those areas are Ecologically dense rich Forests same as the areas listed as "Core Habitat." I urge you to go into the forests labeled "Critical Natural Landscapes."

I also don't understand why this can't be done via town zoning. Ie- ALL FOREST, FARM, and RESIDENTIAL Zones are off the table and ineligible. While Industrial, Commercial, and Business Zones are go zones for solar and battery storage.

3. Furthermore in terms of Ineligible areas there should be no waiver regarding the above, including Critical Natural Landscape. When you state:

"Avoid: The site suitability methodology will be used to help developers avoid areas in which infrastructure development would result in high adverse environmental and social impacts. Additionally, certain particularly sensitive areas may be classified as ineligible areas and projects located in those areas will be ineligible to receive a permit. Large and small clean transmission and distribution infrastructure facilities can apply for a waiver if located in these areas if they can demonstrate no other suitable route or location exists."

^This is unacceptable.

4. When you state:

"Mitigate: If the project's overlap with unsuitable areas cannot be avoided or minimized, the project could be required to take mitigation actions and/or to pay a mitigation fee. Alternatively, the permitting agency could require a mitigation plan. More information on the mitigation fee concept and process is outlined in the section below."

This is unacceptable and inappropriate! The Commonwealth will not stand for companies buying their way around Environmental protection of our commonwealth's sensitive areas. The idea in general of "Mitigate" in your "Avoid, Minimize and Mitigate" basically tells developers that for a certain price it's okay to build your projects anywhere! This is inappropriate and should be removed. It should be Avoid period.

5. Therefore having mitigation fees in general is inappropriate. A project should either be allowed in an area or NOT. And this would be a hard NO to our critical Landscapes and Natural Core Habitats. Or Forest Zoned lands period.

6. NET ZERO is a lie, so please stop using that term. The production alone of Lithium batteries and solar panels takes gas and oil and machines to mine components of, -(not to mention slavery which is not socially just to say the least), and also a humongous carbon footprint to manufacture them.

Let's get real about the actual cost to the environment from A-Z or from cradle to grave so to speak, when informing your "shareholders" on these choices, if you are to calculate things fairly and realistically rather than by-passing using greenwashing terms to feel good about your goals here, to make these important choices. And I say this as a pragmatic idealist and environmentalist who would love for nothing more than a green future.

7. If you are unable to outlaw solar in Forest lands because of the Dover Amendment that seems to have been created when Industrial-Scale solar did not exist, and seems like a shaky leg to stand on in the Federal Courts, then I propose that you put the towns in charge of procuring a certain set amount of renewable energy, by a set amount of time. This would allow the towns the freedom and DEMOCRATIC power they deserve to site this extreme amount of new infrastructure in their towns- in a way that has the least impact to their communities and environment. They would be less likely to oppose projects they feel powerless against, if given the opportunity to site these projects themselves. After a town vote on location, the towns could take bids from industry workers willing to work within the town's vision to make it profitable and beneficial for both parties. Rather than towns being prey to profit-driven developers of projects that have zero interest in the public safety and environmental health of a town. All of your hard work would be still used and these same guidelines rather than being used for developers, would be used for municipalities and towns to align within your created framework.

I think that's all we have for now. Thank you for recording these comments.

Signed,
Lara Wahl, Eli Elkus, Martina Booth, and Zuleica Booth

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Please reply that you have received and considered these comments. Thank you.