

**From:** [Laurel Facey](#)  
**To:** [SitingBoard Filing \(DPU\)](#)  
**Subject:** Stakeholder Comments  
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To Whom It May Concern,

## **50 ways to site your solar**

A year ago, state Sen. Jo Comerford sent a letter to the Secretary of the Executive Office of Energy and Environmental Affairs, regarding energy infrastructure siting and permitting.

"I must ensure that the natural and working lands in my communities do not shoulder undue burden for the state's current lack of progress on solar. Western Mass is used to being exploited for our resources," she wrote.

The Wendell activist group No Assault & Batteries (NAB) submitted to the Healey administration a list of "50 ways" to improve solar and battery siting, including:

Electric power generation, storage, and usage should be close to population centers and industrial end-users, not in lightly populated, rural areas.

One "go" and "no-go" map of suitable sites would end wasted development review and alleviate concerns about loss of home-rule authority. Battery storage must be attached to a solar installation on the same parcel in order to receive local zoning exemption as a solar-related structure.

The cost to consumers of grid expansion should be reported by utilities, along with conservation activities and infrastructure savings.

Energy installations which create a disproportionate adverse environmental impact should not be approved as a suitable site, and must prepare an alternative site which is less harmful environmentally.

not be considered in calculating a suitability score. Developers should minimize bad criteria, and not offset low scores by promising benefits to gain points.

A substation should not be allowed in a location near forests, agriculture, or wetlands just because it is convenient for the utility.

A "Climate Resilience" factor in a suitability tool should go beyond river and sea level rise, focusing on ecosystem services, wildlife, water quality and quantity.

A project's impact on carbon sequestration and storage is an essential criterion and deserves the highest weighting in any formula.

Biodiversity is an important criteria in the scoring weighting. Core Habitat and Critical Natural Landscapes both need to be equally important.

Social and environmental burdens on communities are an important factor, but impacts on rural areas should be included as well. Land and open space in rural areas have been ground zero for energy projects.

In early May, the state held a public hearing on its new site suitability methodology for clean energy generation and battery storage, in order to: 1. Encourage energy development in desirable areas, such as the existing built environment, previously developed, or lower conservation value lands; 2. Avoid, minimize, and mitigate impacts to ecologically important natural and working lands; 3. Steer development away from areas with high potential for climate/environmental hazards; 4. Prevent communities from bearing a disproportionate burden of energy infrastructure; 5. Develop a suitability screening tool for developers seeking a permit.

Here are some major concerns with the state's "straw" proposal, submitted by Michael DeChiara, a member of the Shutesbury Planning Board:

Developers should not be allowed to determine their own suitability score. Scoring should be done by independent third party experts hired by the state, but paid for by the developer.

If environmental harm cannot be avoided or minimized, developers should not be allowed to claim they don't have enough money to fix the problem. Poor siting cannot be approved because it eats into a developer's profits.

Projects on preferred locations like brownfields, built environments or landfills, do not impact forests, carbon sequestration/storage loss, biodiversity, agriculture, and should get the highest score.

"Benefits," like job creation and recreation, should

Agricultural production potential is also an important criterion. Future estimates of crop yield must be verified. Growing crops is not the same as grazing. We must enable vibrant agriculture. Forests should be protected under a category of trees, not agriculture.

Public health and safety should be factored into the siting formula, for solar and energy storage. This means protecting public drinking water, private wells, recreational bodies of water and wetlands.

The site suitability should recognize "ineligible areas," and developers should not be allowed to apply for waivers. If a project has a bad site suitability score, a permitting body should be within its rights to deny the project.

Battery energy storage should include conditions requiring safer technology, and avoid risks of thermal runaways.

Massachusetts has ample sites for solar to meet the state's greenhouse gas emission reduction goals without further sacrificing natural and working lands. Mass Audubon estimates that without any change in our siting policy, we could lose another 9,000 acres of largely forested lands in central and western Massachusetts. Copy this column and email it to: [sitingboard.filing@mass.gov](mailto:sitingboard.filing@mass.gov) by May 27. and to your state lawmakers.

*Al Norman's Pushback column is published in the Recorder every first and third Wednesday of the month.*



AL NORMAN

PUSHBACK

Dear EEA folk,

I am in agreement with Al Norman on all his points for comment. Please add them to your documentation.

Laurel Facey, [REDACTED]

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