

## **Climate Action Now Western Massachusetts Letter to the Energy Facilities Siting Board: Protecting Massachusetts' Natural Heritage Through Responsible Energy Siting**

This letter synthesizes some of the critical recommendations from multiple stakeholder comments in our coalition, urging the Energy Facilities Siting Board to establish robust regulations that prioritize built and disturbed environments for clean energy development, while protecting Massachusetts' irreplaceable forests, farmlands, and vital ecosystems.

### **A Call for Wisdom Over Expedience**

Dear Members of the Energy Facilities Siting Board,

I write to you today not just as a concerned citizen, and a representative of Climate Action Now Western Mass, but as someone who has witnessed the devastating consequences when we allow short-sighted energy policies to destroy the very natural systems that have always regulated our climate. The comments submitted by groups like Wendell's No Assault & Batteries, the Responsible Solar MA network and dedicated community members like Michael DeChiara, Shutesbury Planning Board, and Janet Sinclair, SaveMassForests, paint a clear picture: we are at a crossroads where we must choose between truly sustainable energy development and the continuation of policies that sacrifice our most precious natural resources on the altar of expedience.

We must ask ourselves a fundamental question: How can we justify destroying nature's ancient true green technologies—photosynthesis, carbon sequestration, water cycle regulation—to make room for man-made 'green' technologies that, while of course necessary, can never replace the complex symbiotic relationships that forests, wetlands, and healthy soils provide? More than 50% of carbon storage occurs in soil, roots, and the intricate web of microorganisms and fungi that we destroy when we clearcut forests for solar installations.

But this is not just about carbon calculations because nature's rules and processes are beyond our mathematical comprehension; it's about respecting what we've been given and not letting our understandable anxiety cloud our clarity.

### **The Responsible Solar Framework: A Blueprint for Protection**

The comprehensive recommendations you've heard statewide, reiterated by those of us trying to protect our rights and precious lands and resources from yet further degeneration and loss, provide a clear roadmap for this Board to embrace. The proposal that small energy projects and all Energy Storage Systems should only be allowed on built or disturbed environments aligns perfectly with the [Massachusetts Audubon and Harvard Forest report "Growing Solar, Protecting Nature,"](#) which demonstrates that Massachusetts can meet its solar goals while protecting our most valuable natural and working lands.

We must establish absolute exclusions for energy development on:

- Article 97 protected open space, including all state parks, forests, and wildlife management areas
- Wetland resource areas with mandatory 1,000-foot setbacks
- Properties in the State Register of Historic Places
- All Massachusetts BioMap 2 areas—both Critical Natural Landscapes and Core Habitats
- Outstanding Resource Waters and flood-prone areas
- Prime farmland and public drinking water lands

The prohibition on ground-mounted solar projects on recently deforested land (defined as cleared less than five years ago) is essential and consistent with the Healey administration's own [Carbon Forestry Committee](#) conclusion that keeping forests as forests is crucial for reducing carbon loss.

### **The Dangerous Reality of Current Siting Practices**

You've heard and read from multiple commenters the alarming reality of what happens when we ignore proper siting principles. Energy Storage Systems, particularly lithium-ion batteries, pose severe risks that current distance calculations grossly underestimate. As one commenter noted, when these batteries catch fire—a known risk—the nationally recognized best practice is to let them burn while applying massive amounts of water to prevent thermal runaway.

In rural Massachusetts communities without municipal water systems, this creates an impossible situation where there literally isn't enough water to fight such fires, potentially resulting in forest fires and toxic plumes lasting for days.

The cumulative burden on rural communities has reached unconscionable levels. Central and Western Massachusetts towns have been heavily targeted for industrial-scale solar installations. This represents a fundamental injustice—rural communities bearing the brunt of poorly sited projects, sacrificing essential natural resources needed by the entire region, to meet the energy needs beyond their towns.

### **The Failure of Self-Policing and the Need for Independent Assessment**

A critical flaw in current proposals is allowing applicants to determine their own site suitability scores. This creates an inherent conflict of interest that inevitably minimizes negative impacts. As multiple commenters have emphasized, we need independent, third-party reviewers with no industry connections to conduct these assessments at the applicant's expense. The track record of developer self-reporting under SMART 2.0 has already demonstrated how this approach enables continued poor siting through gaming of adders and offsets.

### **Protecting What Cannot Be Replaced; Nature's climate science**

As NAB stated: "Our wildlands are not for sale, and their loss cannot be mitigated by monetary consideration alone." The suggestion that mitigation fees can somehow compensate for the destruction of mature forests fundamentally misunderstands the irreplaceable nature of these ecosystems. A typical forest in Massachusetts which is 70 to 80 years old, would require at least that long to restore basic forest functions after decommissioning, and longer to restore healthy soil structure, carbon content, and biodiversity. That's assuming these ecosystems retain sufficient integrity, regenerating to regain normal function, in a future reality where climate feedback loops have exacerbated the damage we have inflicted on our environment.

The hydrological cycle must be central to our assessments, as it is as instrumental as the carbon cycle for regulating climate. Healthy ecosystems, especially forests and wetlands, enable essential functioning of both water and carbon cycles. When we destroy these systems for energy projects, we're not just losing trees—we're disrupting the fundamental processes that have kept our climate stable for millennia.

### **A Vision for True Resilience**

Real resilience means redundancy and distributed energy resources that allow communities self-sufficiency during grid failures. But it also means maintaining the ecological resilience that only intact natural systems can provide.

As I've emphasized in previous state hearing testimonies, if our society had been guided by the precautionary principle—by truly doing no harm—we wouldn't be in the polycrisis we face today, including the climate crisis itself.

NAB echoes what most of us are urging: 'The highest site-suitability scores must go to already disturbed or developed lands: brownfields, landfills, parking lots, roofs, and south-facing walls. These sites don't reduce natural and working lands' potential for carbon capture, biodiversity protection, and agricultural productivity.'

### **Local Control and Community Voice**

The recommendations for restoring local control are not about obstructionism—they're about democracy and the fundamental right of communities to protect their health, safety, and welfare. Towns must have the authority to establish locally enforceable safety standards for battery storage, set town-specific capacity and siting goals, and reject proposals that threaten their residents or natural and cultural values. Those who intimately know and cherish the places they live are the best suited to determine how to care for those lands.

### **Summary of Recommendations**

Climate Action Now WMass agrees with the protections recommended by Wendell's No Assault and Batteries, the Responsible Solar Network, and the technical detail provided by Michael DeChiara. Based on the comprehensive analysis provided by these stakeholders, the EFSB should:

1. Establish absolute "no-go" zones for all BioMap areas, prime farmland, wetlands with appropriate buffers, and drinking water protection areas.
2. Require independent third-party assessment of all site suitability scores and cumulative impact analyses.
3. Implement meaningful setback requirements based on worst-case scenarios, not best-case assumptions, particularly for Energy Storage Systems
4. Prioritize built and disturbed environments through scoring that makes undisturbed natural areas economically unviable for development.
5. Restore meaningful local control while providing clear statewide guidance through publicly available "go/no-go" mapping.
6. Eliminate benefits-based scoring that creates loopholes allowing poor siting to be offset by promised amenities.
7. Refer to Michael DeChiara's detailed analysis and the Mass Power Forward Coalition letter for further recommendations and references.

### **A Call for Systemic Wisdom**

We need to work with nature not against it. We need a multipronged approach that includes not only clean renewable energy technologies, but also energy conservation, limits to growth, and support for residents to live within our limitations. We need statewide education campaigns about living in harmony with nature, recognizing that the most expensive and dangerous strategies are those that don't anticipate the future consequences of our actions when they're misaligned with natural systems.

But we sorely need the EFSB and state agencies to demonstrate true leadership by establishing regulations that recognize a fundamental truth: clean renewable energy is essential, but man-made technologies can never replace what nature's true 'green' technologies provide. We must build our clean energy future on already disturbed lands, preserving the forests, farmlands, and ecosystems that our children and grandchildren will need for a livable planet. Our communities, our climate, and our conscience demand nothing less than regulations that truly protect what cannot be replaced while building the clean energy infrastructure we need. We are depending on you to get this right.

Thank you for your consideration of these critical recommendations.

Respectfully submitted,

Lenore Bryck, on behalf of [Climate Action Now Western Mass.](#)

[Regenerative Farming, Forests, Food Systems Group](#)