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To: [SitingBoard Filing \(DPU\)](#)
Subject: Stakeholder comments
Date: Tuesday, May 27, 2025 8:09:27 PM

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To the Energy Facilities Siting Board,

Please accept my comments relating to energy siting regulations and guidelines that are in development:

- 1) "Small" energy projects and all ESS battery systems shall only be allowed on the built or disturbed environment.
- 2) The following areas shall be excluded from large and small energy generation and transmission projects:
 - Article 97 protected open space (note: If Article 97 land is categorized as an ineligible area, an exception for solar canopies - e.g., solar over a DCR beach parking lot- shall be considered.)
 - Wetland resource areas (310 CMR 10.04) and with setbacks of 1,000 feet to identified wetlands resources.
 - Properties included in the State Register (950 CMR 71.03), except as authorized by regulatory bodies
 - BioMap 2 Critical Natural Landscape, Core Habitat, Important Habitat, or Priority Habitat
 - Outstanding Resource Waters, wetlands or rivers
 - Flood plains or flood prone areas
 - On land that provides public drinking water
 - On prime farmland (as defined by the state)
- 3) Ground-mounted solar projects shall not be allowed on newly deforested land, defined as cleared less than 5 years ago.
- 4) Marginal farmland shall be minimally impacted with no decrease in agricultural productivity.
- 5) Language should be included that ensures no negative impacts on:
 - Biodiversity including plants and animals listed under the Massachusetts Endangered Species Act
 - Protected open space
 - Native American cultural areas as determined by Massachusetts' Indigenous people
- 6) Power of discretion and authority shall be provided to the towns that allows for:
 - Locally generated enforceable safety standards for battery storage
 - Town-specific capacity and siting 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 towns' health safety and welfare, and natural and cultural resource protections, as determined by local boards and commissions.

I fully agree with the The MA Audubon/Harvest Forest Study (2023) that says we can get the required solar build-out on the currently built environment.

Forested areas should be avoided for solar siting at all costs as our dense forests provide our best, most-efficient, and least expensive offset to global warming. How on earth does it make sense for supposedly green energy initiatives destroy the forests that cool our planet?

Finally, please consider innovative solar siting technology and strategies for overused, underused, or abused farmlands, like the attached photo advertising dual harvesting in Germany.

Sincerely yours,

Lori Bradley

