

**From:** [Marilyn O](#)  
**To:** [SitingBoard Filing \(DPU\)](#)  
**Subject:** Stakeholders comments.  
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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 below. The stated guidelines below are originally authored by people far more articulate than I. However, I've read every word of the guidelines; studies; and reports, and I FULLY UNDERSTAND IT ALL, and I FULLY AGREE & SUPPORT THESE GUIDELINES - - in fact to the degree that they should be installed as LAW !

Such guidelines are an absolute NO BRAINER ! It does NOT take rocket science to have these guidelines IN PLACE, and AS LAW !

In contrast, it is INTENSELY DISHEARTENING that the Energy Facilities Siting Board simply hasn't had this all in place on their own.

I IMPLORE ALL OF US ~ ~ EVERY CITIZEN, AND ESPECIALLY EVERY PERSON IN LEADERSHIP POSITIONS ... TO STOP LIVING FROM GREED & DESTRUCTION BEFORE IT IS TOO LATE (and that time is here at this moment) !!!!!

THANK YOU FOR FULLY ENACTING THESE FOLLOWING GUIDELINES INTO LAW :

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.

Please see FURTHER STUDIES & REPORTS UNQUESTIONABLY STATING  
FACTS & ABSOLUTE TRUTHS AS TO THE NEED TO ACT WITH FULL INTEGRITY  
FOR THE ENVIRONMENT !!!

1) The MA Audubon/Harvest Forest Study ( 2023) that says we can get the required solar buildout on the built environment. Find the report [on our website](#).

2) The [Healey Administration Carbon Forestry Committee](#) report that concludes that we should not be converting forested land for energy production. “Reduce unnecessary forest land conversion via collaboration across state agencies and complementary policies, infrastructure investments, and other actions (e.g., solar facilities, powerlines, highways, housing, or other development).... Forest conversion on any given acre results in more carbon loss than harvesting on average, is more permanent, and also results in the loss of all other forest benefits.” (page 48)

3)The Executive Office of Environmental Affairs (EEA)( plus associated agencies) [siting report](#) that includes suggestions for what lands should be avoided for the energy build out.

Very Sincerely,  
Marilyn O'Neil



email profile photo courtesy of [freedigitalphotos.net](#)  
May we walk gently on the earth, with all that entails ...