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To: [SitingBoard Filing \(DPU\)](#)
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- 1) The EFSB should act as a siting board not just a project approval board. Instead of responding to applications, offerings, etc. from project advocates or developers, the EFSB should develop plans for generating facility sites, transmission systems, and perhaps distribution systems. This needs to be done with participation of utilities, ISONE, representatives of environmental organizations and agencies, and representatives of potentially affected municipalities. Relying on "market place" strategies will not result in an economically optimum, environmentally sensitive, or equitable system.
- 2) The effects of energy facilities on loss of all the benefits of forests and agricultural land must be given appropriate consideration. Simple calculations of reduced carbon emissions by kWh produced by "clean energy" generators compared with carbon captured by forests are misleading at best. Carbon released during resource production, equipment manufacture, transportation, site preparation, installation, removal, and disposal of the "clean energy" facility, including all the overheads involved should be taken into account as well as the lost storage and sequestration from clearing the site. If this evaluation of effects is done properly, it should drive clean energy site selections away from forests and farms and toward the developed environment.
- 3) In developing plans, criteria, site evaluations, etc. the EFSB should take into account the cumulative effects of all projects required to achieve the state's clean energy goals.
- 4) Any statewide certification standards to be developed for municipalities governing small energy facilities projects must include features to allow municipalities to reject applications or impose conditions to preserve the values of their communities.

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