

**From:** [Susan Starkey](#)  
**To:** [SitingBoard Filing \(DPU\)](#)  
**Subject:** Comment on the Cumulative Impacts Analysis and Site Suitability Criteria  
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Dear Siting Board,

I'm a member of the Faith Communities Environmental Network (FCEN) and a resident of Cape Cod. I believe that our State has the opportunity to promote Solar Energy AND protect our forests and wetlands- but we must act now by creating strong guidelines. Cape Cod has less than 13% of our land that is either protected or undeveloped and we cannot afford to lose any trees; our waters and animal life also need all the protection we can offer them. Therefore we recommend that the Cumulative Impacts Analysis and Site Suitability Criteria include:

- Siting guidelines and criteria must be strong enough to avoid the development of clean energy projects on our highest-value, irreplaceable natural and working lands entirely.
- Developers should be encouraged to prioritize new solar projects on rooftops, commercial buildings, parking lots, and landfills. Ground-mounted solar projects should be steered to already-developed parcels and lower-impact sites over sites with high natural resource values.
- Projects with significant footprints on natural landscapes must be changeable during the design and pre-approval phase to avoid and minimize impacts to nature and ecosystem functions.
- For project impacts that do affect natural carbon storage, wildlife habitat, and other ecosystem functions (like drinking water protection), energy developers must be required to directly compensate the public for any losses.
- Analyses on cumulative impacts of energy infrastructure should inform criteria to help steer further energy development away from communities that have borne a disproportionate burden from these projects.
- Cities and towns, especially those with limited resources, must have sufficient technical and financial support to site and permit projects.

Sincerely,

Susan Starkey, Co-Chair

<https://capecodclimate.org/faith/>

