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Conservation
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Siting and Permitting Reforms Briefing

2024 Climate Act Regulations: **Energy Facilities Siting Board (EFSB)**

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Overview of Presentation

- General update on EFSB progress towards implementation of the 2024 Climate Act (the “Act”)
- Closer look at:
 - EFSB Consolidated Permit Application, regulations and guidance
 - Constructive Approval
 - Cross-cutting issues
- Afternoon panel:
 - EFSB CIA Regulations and Site Suitability in 980 CMR 15.00
 - Director Dhamaraj will present on EFSB Pre-filing and Intervenor Support Grant Program



Major Siting and Permitting Provisions of the 2024 Climate Act

- Creates a new category of infrastructure: Clean Energy Infrastructure Facilities (“CEIF”)
- Expands Siting Board jurisdiction to include Large Clean Energy Storage Facilities (“LCESF”)
- Creates two Consolidated Permit programs
 - Large CEIF – Consolidated Permit issued by the Siting Board
 - Small CEIF – Local Consolidated Permit issued by a municipality
- Establishes deadlines for deciding on an application; constructive approval if deadlines not met
- Establishes new requirements for CEIF applicants, including:
 - Pre-filing public outreach
 - Cumulative Impact Analysis (“CIA”) and Site Suitability Assessment
- Expands Siting Board membership; establishes a new mandate, scope of review, and required findings
- Moves Department of Public Utilities siting jurisdiction to the Siting Board



Status of Final Regulations

Chapter of Draft Regulation	Status	Title Summary
980 CMR 1.00 – EFSB revised	Final	Adjudicatory Proceedings
980 CMR 2.00 – EFSB revised	Final	Board Business
980 CMR 13.00 – EFSB new	Final	Consolidated Permits
980 CMR 14.00 – EFSB new	Final	De Novo Adjudication
980 CMR 15.00 – EFSB new	Final, pending publication	Cumulative Impacts Analysis and Site Suitability
980 CMR 16.00 – EFSB new	Final	Pre-filing Consultation and Engagement
980 CMR 17.00 – EFSB new	Revising proposed final regulation	Constructive Approval
980 CMR 4.00, 5.00, 7.00, 8.00, 11.00	Final	Repeal of Unused Regulations
220 CMR 32.00 – DPU new	Proposed final regulation	EFSB Application Fees
220 CMR 34.00 – DPU new	Final	Intervenor Support Grant Program
225 CMR 29.00 – DOER new	Final	Consolidated Local Permit



Important Future Milestones

Milestone	Dates
980 CMR 17.00 Constructive Approval - Board approval of final regulation	May - June 2026
Revise draft Baseline Health, Safety and Environmental Standards	May - June 2026
Revise draft Common Conditions	May - June 2026
Final Revisions to Draft Application Guidance (including Application Completeness Checklist)	May - June 2026
220 CMR 32.00 EFSB Fees Final Regulation	June 2026
Target launch of Siting and Permitting Portal and Dashboard	July 2026
Implementation of New Consolidated Permit Program	July 1, 2026
Additional Stakeholder Outreach on Implementation	Ongoing



Changes to the EFSB

- Decision-making body for applications to construct energy facilities; process defined in 980 CMR 2.00
- 2024 Climate Act increase in Board membership (11 members), and
- Adds new required considerations, such as:
 - Formal requirement for Board to follow the hierarchy of avoid, minimize, and mitigate project impacts
 - Formalizes additional longstanding policy considerations including: labor, economic & environmental justice and equity, public health, and safety
 - Requires consideration of recommended permit conditions by Local Government and other state agencies
 - Cumulative impact analysis for all projects reviewed by the Board
 - Reasonably foreseeable climate change impacts



How the EFSB Makes Decisions

- Adjudicatory Proceedings – process defined in 980 CMR 1.00
- Phases of proceeding
 - Pre-filing Consultation and Engagement
 - Once Application is filed
 - Completeness Determination and public comment process
 - Includes notice of the proceeding, public comment hearings, intervention
 - Evidentiary process
 - Includes discovery, evidentiary hearings, Conditions Conference, briefing
 - Decision process
 - Includes Staff draft of Tentative Decision, comments, Board meeting to deliberate and vote, final decision



980 CMR 16.00: Pre-filing Consultation and Engagement Requirements

- 980 CMR 16.00 applies to LCEIF, SCEIF, and “Legacy” (fossil) Facilities
- Establishes pre-filing requirements for Applicants to ensure that Project information reaches those who may be impacted by a Project, and provides stakeholders an opportunity to influence Project design
- Requires Applicant to consult with Key Stakeholders, MEPA Office, and permitting agencies, hold at least two public meetings with the Community, use multiple channels of outreach, and create a project webpage
- Provides Applicants with flexibility to tailor pre-filing schedules to the project and community, does not specify timing or duration for completion of pre-filing requirements
- Balances the goal of providing project information to Key Stakeholders early during project development with the Applicant’s need to do adequate due diligence



980 CMR 13.00: EFSB Consolidated Permits for CEIF

- EFSB required to establish a "common standard application" for a: (1) Consolidated Permit (all state and local permits); and (2) Consolidated State Permit (all state permits) (collectively, an "EFSB Consolidated Permit")
 - Large Clean Energy Infrastructure Facilities (§ 69T) (**Consolidated Permit**)
 - Small Clean Transmission and Distribution Infrastructure Facilities (§ 69U) (**Consolidated Permit**)
 - Small Clean Generation and Small Clean Storage Facilities (§ 69V) (**Consolidated State Permit**)
- The De Novo Adjudication process (§ 69W) may result in an EFSB-issued "Consolidated Local Permit" that would normally be issued by Local Government – but not included in definition of an "EFSB Consolidated Permit"



CEIF Consolidated Permit “Cheat Sheet”

Large v. Small / EFSB or Local Jurisdiction

Facility Type/Description	Capacity/Size	Permitting Authority
Generation – Solar*; Wind; Anaerobic Digester * Nameplate capacity for a Solar Facility is measured in DC; other generation types are unspecified as to AC or DC	≥ 25 MW (Large)	EFSB – Consolidated Permit & Pre-filing Process per § 69T + Zoning Exemption (if requested)
	< 25 MW (Small)	Local - Consolidated Local Permit & Pre-filing Process per c. 25A, § 21 ¹ EFSB – Consolidated State Permit per § 69V (EFSB opt-in by developer); otherwise, individual state permits; + Zoning Exemption (if requested)
Energy Storage System	≥ 100 MWh (Large)	EFSB – Consolidated Permit & Pre-filing per § 69T + Zoning Exemption (if requested)
	< 100 MWh (Small)	Local - Consolidated Local Permit & Pre-filing Process per c. 25A, § 21 ¹ EFSB – Consolidated State Permit per § 69V + Zoning Exemption (if requested) (EFSB opt-in by developer); otherwise, individual state permits;
Transmission Infrastructure (and ancillary facilities) - Large - ≥ 69 kV and ≥ 1 mile (new transmission corridor) - ≥ 115 kV and ≥ 10 miles (existing transmission corridor) (except reconductoring at same voltage) - New transmission infrastructure (inc'l substations/structures) requiring zoning exemptions - Facilities needed to connect offshore wind to grid		EFSB – Consolidated Permit & Pre-filing Process per § 69T + Zoning Exemption (if requested)
Transmission Infrastructure (and ancillary facilities) - Small - < 1 mile (new transmission corridor) - < 10 miles (existing transmission corridor) - Distribution-level projects meeting a size threshold TBD by DOER - Reconductoring/rebuild at the same voltage - Substations/upgrades <u>not</u> requiring zoning exemptions		Local - Consolidated Local Permit & Pre-filing Process per c. 25A, § 21 ¹ - OR - EFSB – Consolidated Permit & Pre-filing Process per § 69U (EFSB opt-in by developer; EFSB pre-filing process applies)

1. The Pre-filing process will occur under DOER’s Consolidated Local Permitting Guidelines and will not be subject to the EFSB Pre-filing process (unless local permits are sought individually). Local government may transfer a Consolidated Local Permit application to the EFSB Director, per § 69W, if resources and staffing do not allow for local review. A request for de novo adjudication of a Local Consolidated Permit decision may also be submitted to the EFSB Director, per § 69W, and would not require additional Pre-filing process.

Color Key: EFSB jurisdiction; Local Government jurisdiction using DOER regulations



Pro-Forma EFSB Schedules to Meet Statutory Deadlines

EFBS 15-MONTH PROCESS

Applicable to Large Clean Energy Infrastructure Facilities (e.g.):

- New (≥ 69 kV) Transmission Line in New Corridor (≥ 1 mile)
- New (≥ 115 kV) Transmission Line in Existing Corridor (≥ 10 mile)
- Substations Requiring Exemptions from Local Zoning Ordinances
- Interconnection Lines for Offshore Wind Facilities
- Large Energy Storage Facilities (≥ 100 MWh)
- Large Clean Energy Generation Facilities (≥ 25 MW)

EFBS 12-MONTH PROCESS

Applicable to Small Clean Transmission and Distribution Infrastructure Facilities (e.g.):

- Transmission Line Reconductoring and Rebuilding Projects
- New/Substantially Altered Transmission Lines in Existing Corridors (< 10 mile)
- New/Substantially Altered Transmission Lines in New Corridors (< 1 mile)
- Substations Not Requiring Exemptions from Local Zoning Ordinances
- Certain Distribution Level Projects (Threshold to be Determined by DOER)

PROCEDURAL STEPS/MONTHS (M)	PRE-FILING	M0	M1	M2	M3	M4	M5	M6	M7	M8	M9	M10	M11	M12	M13	M14	M15
Pre-filing Engagement Requirements	→																
Project Application Filed and Completeness Determination (Within 1 Month of Application)	→	→	Other Permitting Agencies Can Make Recommendation on Completeness Determination Public Can View Application materials														
Public Notice of Project and Public Comment Hearing (Within 1 Month of Completeness Determination)			→	Other Permitting Agencies Can Petition to Participate in Proceeding as Intervenor Public Can Attend Hearing, Provide Comments, Petition to Participate in Proceeding as Intervenor													
Intervention and Grant Rulings				→													
Preliminary Procedural Conference and Procedural Order				→													
Statement of Recommended Permit Conditions					→												
EFBS Adjudication and Evidentiary Hearings (Including Written Discovery and Briefing) and Conditions Conference							→										
EFBS Tentative Decision and Comments (Including Staff Drafting and Review)																	
Board Meeting to vote on Final Decision																	



EFSB Consolidated Permit Components

- EFSB Consolidated Permit is an “aggregation” of EFSB-Issued:
 - Individual state permits and approvals using existing state agency application forms, and substantive regulatory requirements
 - Local* permits and approvals (if applicable) with Applicant choice of either:
 - (1) DOER Consolidated Local Permit application form; or
 - (2) Individual Local application forms, for each local permit and municipality
 - EFSB “Construction Permit” – addresses applicable EFSB statutory requirements (e.g., need, minimization of cost and environmental impact, reliability, project/route alternatives, public health and safety, climate change, policies of the Commonwealth, etc.)

* The 2024 Climate Act includes Regional Permit Enforcement Agencies (like the Cape Cod Commission) in the definition of Local Government.



EFSB Consolidated Permit Application Requirements

- Based on requirements in [980 CMR 13.00](#) and [EFSB Draft Consolidated Permit Application Guidance](#) (“Application Guidance”)
- Application Guidance includes:
 - Attachment 1: [Common Conditions and Requirements](#) for EFSB Consolidated Permits (draft)
 - Attachment 2: [Uniform Set of Baseline Health, Environmental, and Other Standards](#) (draft)
 - Attachment 3: Application Completion Checklist: *In development*



Consolidated Permit Application: Baseline Standards

- 2024 Climate Act requires the Board to establish a “uniform set of baseline health, safety, environmental and other standards that apply to the issuance of a consolidated permit.”
- EFSB’s [current draft Baseline Standards](#) are in 980 CMR 13.00 Application Guidelines, Attachment 2.
- The Baseline Standards generally incorporate existing regulatory standards in effect; the EFSB may create some unique standards in the future (such as maximum magnetic fields).



Consolidated Permit Approval Conditions

Pre-Filing Stage

- Applicable Common Conditions considered and adapted by Applicant in developing the Project proposal
- Pre-filing consultations by Applicant with PEAs and Key Stakeholders, and wider community
- Pre-filing comments by PEAs on Applicant's draft Applications and draft Permits; and Applicant's response
- Division of Public Participation ("DPP") Opinion on significant concerns raised during Pre-Filing

EFSB Adjudication Stage

- Revisions proposed by Applicant in submission of Application, and proposed permits to EFSB
- Public comments
- Completeness Review comments by PEAs, Applicant responses, deficiencies cited by Presiding Officer
- Statement of Recommended Permit Conditions by PEAs
- Conditions Conference discussions
- Presiding Officer Recommended Permit Conditions and Requirements
- Development of the full evidentiary record
- Staff recommendations in Tentative Decision
- Board deliberation, amendments, and final vote



EFSB Consolidated Permit Application: Final Steps Needed

- Finalize Application Guidance; add an Application form ([similar to DOER's](#))
- Incorporate comments and input on a revision of draft Common Conditions – possible technical session
- Incorporate comments and input on a revision of draft Baseline Standards
- Develop Application Completeness Checklist for comment ([similar to DOER's](#))
- Migration of final Application materials to new filing portal and dashboard
- Outreach, education, and training for state and local PEA staff, community-based organizations, and the general public



EFSB Consolidated Permit Application: Questions and Clarifications

- What assurance is there that the Completeness Determination will not be misused to create delay?
- Which agencies are PEAs?
- How does an EFSB Consolidated Permit assign enforcement responsibilities to avoid duplication or enforcement gaps?
- Are the draft Common Conditions too prescriptive or too generic? Do they have real benefit?
- Do Baseline Standards that largely refer to other regulatory requirements add value? Should the EFSB be establishing more of its own substantive review standards?



980 CMR 17.00: Constructive Approval

- If the Siting Board does not issue a final decision on an Application for a Consolidated Permit by the statutory deadline, the Application (including a zoning exemption if requested) is constructively approved
 - 15 months for Large Clean Energy Infrastructure Facilities
 - 12 months for Small Clean Energy Infrastructure Facilities
 - Does not apply to Legacy facilities, or de novo adjudication under Section 69W
- Staff proposal leverages the Conditions Conference to provide tailored conditions for Constructive Approval, rather than “generic” Common Conditions; provides opportunities for input by parties and PEAs
- Constructive Approval would take effect by law; requires no further action by Board



980 CMR 17.00: Constructive Approval: Common Conditions

- 2024 Climate Act requires Board to establish “Common Conditions” for EFSB Consolidated Permits in the event of Constructive Approval
 - Climate Act indicates that Common Conditions may differ by type of CEIF
- The proposed Common Conditions reflect “generic conditions” – some apply to all CEIFs, others only to specific types of CEIF.
- The Common Conditions identify the type of permit to which they attach, and the name of the permit enforcement agency (“PEA”).



980 CMR 17.00: Constructive Approval: Questions and Clarifications

- Comments received indicate divergent recommendations on how to incorporate conditions in Constructive Approval
 - Some favor reliance on the Consolidated Permit Application
 - Some movement towards staff proposal for use of the Presiding Officer Recommended Permit Condition and Requirements
 - Some concerns about Constructive Approval approaches providing too much discretion to Applicants
 - EFSB is striving to strike the right balance on following statutory requirements, meaningful and necessary conditions to fulfill statutory objectives, and administrative efficiency



Cross-Cutting Issues: Transition Issues

- Several developers requested transition guidance on EFSB rules to provide certainty for clean energy projects already in development and facing challenges from federal tax credit changes and restrictions. The issues include:
 - Clarification that existing CEIF projects may continue local permitting under current rules, without EFSB review, if local permits have been requested by March 1, 2026, and possibly as late as July 1, 2026.
 - “Requested Local Permits” to be read broadly to include: ANRADs (wetlands delineation); Order of Conditions; special permits; variances; site plan reviews; subdivision plans; and other local permits.
- This guidance is consistent with the intent of the 2024 Climate Act to accelerate the deployment of clean energy infrastructure. The Final Decision incorporated this concept.



Cross-Cutting Issues: Alignment with DOER Consolidated Local Permit Rules

- EFSB continues to work closely with DOER on siting and permitting rules and implementation measures to achieve alignment.
- DOER's regulations acknowledge that Applicants may choose whether to seek either a Consolidated Local Permit, or individual permits at the local level under existing rules.
- EFSB allows for Applicants to submit either: (1) DOER's Consolidated Local Permit Application and a draft of the Consolidated Permit, or (2) the individual local permit applications and draft permits.
- Consolidated State Permit (under § 69V) requires EFSB pre-filing procedures, if Applicant is not seeking a Consolidated Local Permit.
- Applicants that pursue local permits individually will not be eligible for De Novo Adjudication under 980 CMR 14.00.



980 CMR 14.00: De Novo Adjudication of Consolidated Local Permits

- Two types of De Novo adjudications
 - Objection by Applicant, or other persons “substantially and specifically affected” by a Final Decision of Local Government (or a local Constructive Approval)
 - Transfer of a Consolidated Local Permit Application, at request of Local Government, when it lacks resources, capacity or staffing
- Expedited process (6 months for objections; 12 months for transfer)
- Decision made by the Siting Board Director
- Appeals directly to the Supreme Judicial Court



Updates on 220 CMR 32.00: Application Fees

- Application fee comments received; final regulation nearing completion
 - Comments by EDCs, and clean energy developers. Concerns about statutory interpretation, fairness, and potential for adverse effects on CEIF development.
 - Need for a tracking system, if not built into the Filing Portal
- DPU will issue Order with final regulations



Questions & Comments



980 CMR 15.00:

Cumulative Impact Analysis/Site Suitability

- “Cumulative Impact” is the combined effects of past and present private, industrial, commercial, federal, state, or municipal projects, operations, development, and other economic activities, in addition to the effects of the proposed Project on: (1) the environment; (2) public health; and (3) reasonably foreseeable effects of climate change.
- CIA Guidelines, now final, developed by Office of Environmental Justice and Equity (“OEJE”).
- “Burdened Areas” are Census Block Groups that meet one or both of the following criteria:
 - cumulative burden percentile score (i.e, MassEnviroScore) of 75 or greater, OR
 - annual median household income is 65 percent or less of the statewide annual median household income



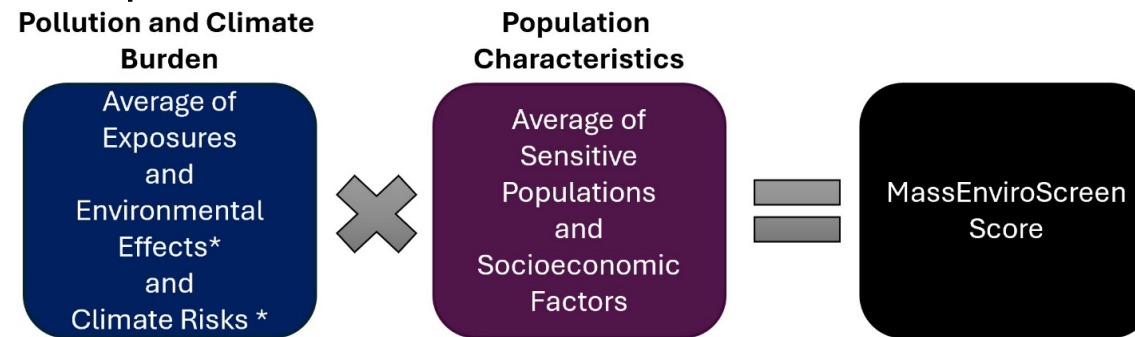
The CIA Process Overview

- 1 Identify the Specific Geographical Area (“SGA”) of the Project
 - 2 Determine if the SGA overlaps any Burdened Areas
 - 3 Identify Indicator values and any Elevated Indicators of the BA
 - 4 Identify Project Impacts (positive or negative), including Disproportionate Adverse Effects, in the Burdened Area related to Elevated Indicators
 - 5 Propose remedial actions for any Disproportionate Adverse Effects
- Analysis Using
MassEnviroScreen



MassEnviroScreen Methodology

- Indicators are standardized and combined into component scores
- There are two major components:
 - Pollution and Climate Burden = Exposures + Environmental Effects + Climate Risks
 - Population Characteristics = Sensitive Populations + Socioeconomic Factors
- The model follows this conceptual formula:



- MassEnviroScreen assigns a cumulative burden score (0 – 100) to every census block group in Massachusetts
- The MassEnviroScreen score also represent percentile ranks, which means that a community's score also indicates the percentage of scores in a group that are equal to or higher than a given score.



Radial Distances from Facility Boundary

Determine the “Specific Geographical Area”

Specific
Geographical
Areas – Radial
Distances from
the Facility
Boundary

Facility Type (or component of a Facility)	Radial Distance from Facility Boundary
Transmission and Distribution Line (part of an LCTDIF or SCTDIF)	1/4 Mile
Clean Energy Storage Facility (LCESF or SCESF)	1 Mile
Substation (Part of an LCTDIF or SCTDIF)	1/2 Mile
Ground-Mounted Photovoltaics (LCEGF or SCEGF)	1/2 Mile
Onshore Wind Facility or Anaerobic Digester (LCEGF or SCEGF)	1 Mile
Liquefied Natural Gas Facility (§ 69J)	1 Mile (no Air permit) 2 Miles (non-Major Air Permit)
Gas Pipeline (§ 69J)	1 Mile
Fossil Generating Facility (§ 69J ^{1/4})	2 Miles (non-Major Air Permit) 5 Miles (Major Air Permit)
Gas Compressor Station (§ 69J, as part of a Gas Pipeline)	1 Mile (no Air permit) 2 Miles (non-Major Air Permit) 5 Miles (Major Air Permit)

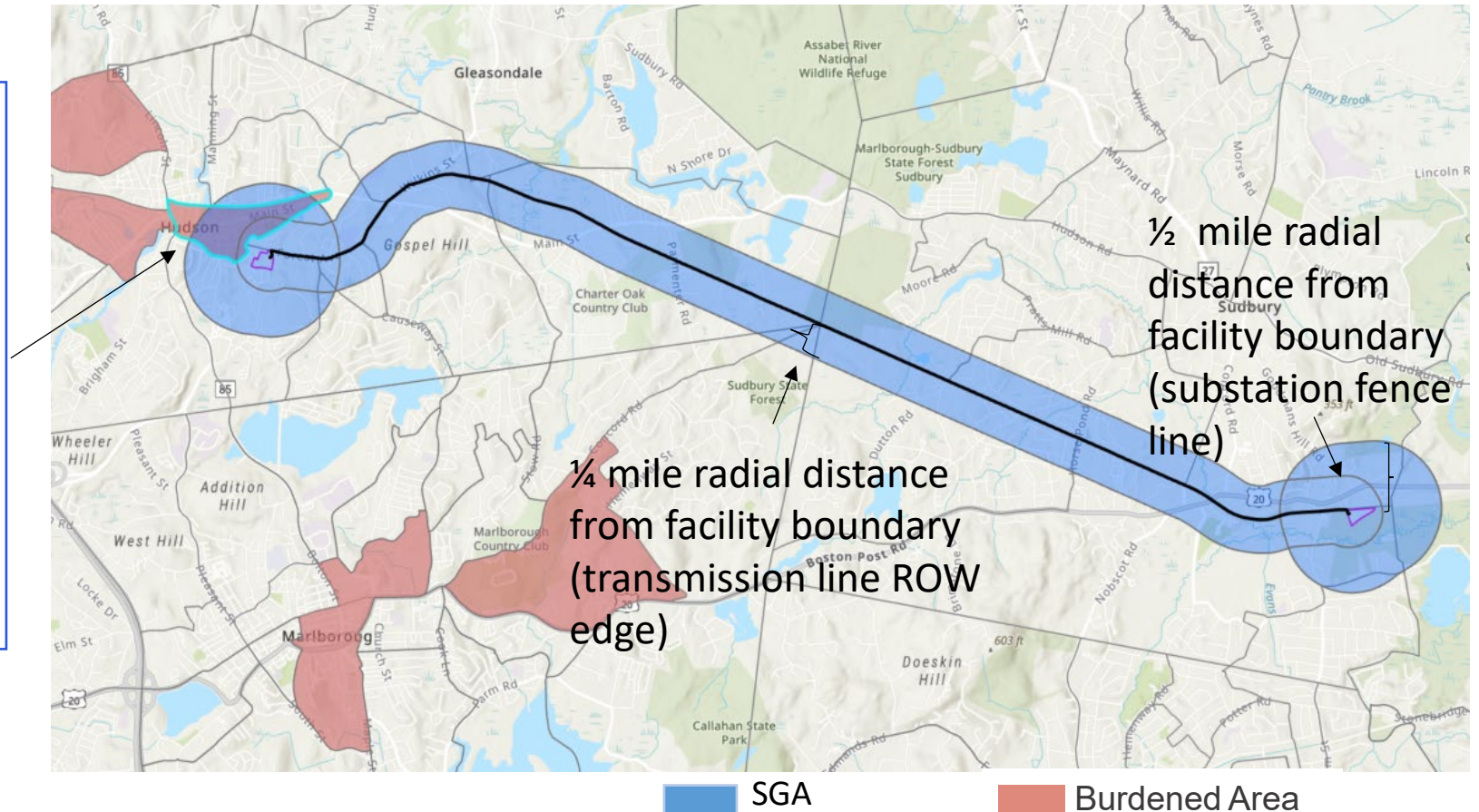


Example: Burdened Areas that Overlap the SGA

- Use MassEnviroScreen Project Draw Function (*under development*) to overlay Project footprint and Radial Distances on MES Map
- Identify any overlap between the SGAs and Burdened Areas. In this example, one BA (Census Block Group) overlaps the SGA.

This Census Block Group in Hudson IS a Burdened Area that overlaps the SGA

- MassEnviroScreen score = **85.6**
- Median Household Income = **\$85,170 or 84% of statewide median household income**





CIA Report Contents

- [CIA Report Template](#) developed to facilitate reporting
- Noticed Site or Route to be assessed
- Map(s) showing SGA(s) with any overlapping Burdened Area(s)*
- Project Impacts related to Elevated Indicators and whether Project materially exacerbates existing conditions
- Disproportionate Adverse Effects
- Proposed Remedial Actions to address Disproportionate Adverse Effects

**If the SGA does not overlap with any BAs, the Applicant's CIA Report is brief. Depending on the Project type, Site Suitability Report may be required.*



Petition for a CIA in a Non-Burdened Area

- CIA Petition - allows a group of ten or more residents and businesses in a Census Block Group that intersects the Project's SGA and is not identified as a Burdened Area to submit a petition to the EFSB to require the Applicant perform a CIA in the Census Block Group for that Project.
- Request must be made during pre-filing. If Applicant declines to perform the requested CIA, the group may file a petition with the EFSB Director.
- Siting Board Director may grant the CIA Petition only if “extraordinary circumstances” are shown to exist regarding the Census Block.
- CIA Petition process includes procedural protections to ensure that the process does not cause delay to the proceeding.



Board Review of CIA Reports

- The Board assesses whether the CIA Report meets regulatory criteria pursuant to 980 CMR 15.11 (per below).
- The Board shall:
 - Assess the adequacy of the CIA Report and Site Suitability Report, including whether the Applicant, if required to, presented a comprehensive analysis of whether its Project Impacts will result in a Disproportionate Adverse Effect, and make findings based on that review.
 - Make findings as to whether the Applicant has given due consideration to the Cumulative Impact of the Project, and whether the Applicant has adequately undertaken actions to avoid, minimize, or mitigate any Disproportionate Adverse Effects from the Project.
 - Consider an Applicant's use of a Community Benefit Plan or Community Benefit Agreement in accordance with [CBA/CBP Guidance](#) from OEJE.



Site Suitability Report (SSR)

- [Guidance for SSR](#) developed by EEA; developing a SSR Template
- [Site Suitability Mapping Tool](#): Makes use of publicly available datasets/tools to evaluate sites based on the following criteria: carbon storage/sequestration, biodiversity, agricultural resources, and social & environmental burdens
- Applicants estimate scores during pre-filing and share with stakeholders to allow time for changes to project design or possible use of alternative sites
- Results considered in review/adjudication of Consolidated Permits



Site Suitability Report Criteria

- **Climate Change Resilience:** exposure of sites to (1) riverine flooding; and (2) coastal flooding from sea level rise and storm surge
- **Carbon Storage and Sequestration:** the estimated level of current ecosystem carbon stocks and projections of future carbon sequestration over 50 years that would be lost within a project's Site Footprint
- **Biodiversity:** assesses avoidance of negative impacts on land and waters with high habitat and biodiversity conservation value, which are identified primarily from [BioMap](#), the Commonwealth's biodiversity conservation mapping initiative. Suitability will be scored based on Site Footprint overlaps with:
 - Specific BioMap elements or components (e.g. Core Habitat and Critical Natural Landscape)
 - [Priority Habitats](#) designated by the [MassWildlife Natural Heritage and Endangered Species Program](#) (NHSEP); and
 - [Index of Ecological Integrity](#) values from the [UMass Conservation Assessment Prioritization System \(CAPS\)](#).



Site Suitability Report Criteria (Continued)

- **Agricultural Resources:** assessed in terms of avoiding and minimizing negative impacts on areas with soils that are particularly well-suited for agricultural production, particularly when those areas are active farmland. Suitability will be scored based on Site Footprint overlaps with:
 - National Resource Conservation Service's [Prime Farmland Soils categories for Massachusetts](#).
 - The most recent year of land cover data from the U.S. Geological Survey's [Annual National Land Cover Database \(NLCD\)](#).
- **Social and Environmental Burdens:** assessed by Facility's Site Footprint and its intersection with the scores in the [MassEnviroScreen tool](#)
- **Social and Environmental Benefit Criteria Score Modifiers:** The Applicant's Criteria-Specific Suitability Scores may be modified by the Board when the Applicant agrees to provide certain social or environmental benefits as described in the Site Suitability Guidance. Score modification may only occur upon the mutual written agreement between the Applicant and the Local Government



Site Suitability Report Implementation in Board Application Reviews

- Applicants use the Site Suitability Mapping Tool to derive the anticipated Criteria-specific Suitability Scores for a proposed CEIF.
- The Applicant files Site Suitability Report (“SSR”) with its EFSB Consolidated Permit Application.
- Applicant or Key Stakeholder may request a score revision by the Director if Criteria-specific Suitability Scores are based on materially erroneous, incomplete, or otherwise faulty data.
- The Board shall consider the SSR in its route and site scoring analysis, if applicable; Criteria-specific Suitability Scores are used to inform the Board’s decisions on avoidance, minimization, and mitigation of Project Impacts, and its overall decision on whether to grant a Consolidated Permit.



Questions & Comments