

**OCTOBER 31, 2025**

Massachusetts Executive Office of Energy and Environmental Affairs (EEA)  
Attn: Secretary Rebecca Tepper  
100 Cambridge Street, 9th Floor  
Boston, MA 02114

**Submitted via Email**

**Re: Public Comments on EEA Site Suitability Assessments for Clean Energy Infrastructure**

Dear Secretary Tepper and EEA Staff,

On behalf of BSC Group, we appreciate the opportunity to provide comments on the **Site Suitability Assessments for Clean Energy Infrastructure**. As an environmental and engineering consulting firm that assists public and private clients in utility and renewable energy development, infrastructure permitting, and environmental compliance across Massachusetts, we recognize and support EEA's leadership in advancing the Commonwealth's clean energy goals through thoughtful and equitable siting practices.

**General Comments and Recommendations**

To enhance the usability and accuracy of the Site Suitability Assessment tool, we recommend that EEA consider incorporating functionality that allows applicants to upload project-specific GIS files (e.g., KMZ or shapefiles) directly into the mapping interface. Many applicants, particularly those representing larger or more complex projects, rely on precise geospatial data to delineate project boundaries and assess potential environmental and community impacts.

Providing the ability to upload and overlay site-specific GIS data would:

- Improve accuracy in evaluating mapped features such as BioMap Core Habitat, Wetlands, EJ areas, and other sensitive resources.
- Reduce uncertainty associated with visual alignment and screen-based polygon placement.
- Increase efficiency by eliminating redundant manual data entry and improving consistency between project documentation and state data layers.
- Facilitate better communication between applicants, reviewers, and community stakeholders by ensuring a shared, precise understanding of project limits.

This feature would significantly improve workflow efficiency for applicants and enhance the precision and transparency of site evaluations conducted through the EEA's online assessment platform.

**Key Questions for Clarification**

We would like to respectfully request clarification on how certain elements of the Site Suitability Assessment scoring are applied, particularly those related to ecological and biodiversity mapping layers, such as *BioMap Core Habitat* areas and *Biodiversity Index* mapping (dark green areas).

The current scoring framework appears to categorize sites as either “in” or “not in” these mapped areas, without accounting for cases where only a small portion of a project parcel overlaps these mapped features. Our questions are as follows:

How is the scoring affected if only a small portion of a site, such as the edge of a parcel, overlaps with a BioMap Core Habitat or high Biodiversity Index area? Does this result in the entire site receiving a higher biodiversity sensitivity score, even when the majority of the parcel is disturbed, developed, or lacks habitat value?

Additionally, because mapping layers are often not spatially precise, boundaries may extend into disturbed or developed areas that no longer provide ecological function. For example, a disturbed site adjacent to a forested area may appear partially within a mapped habitat layer due to the alignment of the dataset’s boundary line. In such cases, would it be acceptable for an applicant to provide a site-specific assessment demonstrating that the project area itself does not provide high-quality or biodiverse habitat, and to propose that the mapped boundary be interpreted accordingly for scoring purposes?

Similarly, it would be helpful for EEA to clarify how the scoring process is applied to projects that encompass a large area composed of multiple parcels, or to linear facilities located within new rights-of-way that extend over several miles. Would scoring be determined on a parcel-by-parcel basis or applied uniformly across the entire project footprint or right-of-way?

Clarifying how EEA intends to handle these nuances would be very helpful for practitioners assessing project suitability and consistency with the guidance. We support the intent of the assessment to direct projects toward appropriate sites while recognizing that spatial datasets have inherent limitations that can affect site-level accuracy.

Thank you again for the opportunity to comment and for your continued leadership in advancing thoughtful, equitable clean energy siting in Massachusetts.

Sincerely,

**BSC Group, Inc.**



Melissa Kaplan, PWS  
Licensing & Permitting Team Lead