

Gronendyke, Kathleen M (EEA)

From: Brittany Gravely <biosphere@public-information.org>
Sent: Friday, October 31, 2025 11:41 AM
To: EnergyPermitting (EEA)
Subject: Comments on Solar Site Suitability Guidance

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Dear EEA and DOER,

Please consider my comments relating to your site suitability guidelines drafts. I am echoing many of the recommendations by my esteemed environmental colleagues and organizations:

1- Section B- For site suitability scoring, please ensure that any individual or group who feels impacted or harmed can request a score review under sections iv and v.

2- For Section C Criteria, I. Climate Change Resilience: The criteria should include protecting forests and water, minimizing storm water run-off, and retaining soil integrity, in order to achieve greater resiliency in a changing climate. The Resilient Design Standards Tool should also be used to determine if the project will contribute or add to local conditions of Extreme Heat in the community.

3 - For Section C. Criteria, II. Carbon Storage and Sequestration: Update the National Forest Carbon Monitoring System and the Annual NLCD land cover data websites. They are not user-friendly making it difficult for to review by local government or stakeholders.

4- For Section C. Criteria, III. Biodiversity: There should be a process to ensure that a robust inventory of of wildlife and rare species be applied in the Biodiversity index, plus a clear mechanism for inclusive local appeal of the biodiversity criteria.

5- For Section E. Other Considerations of Note: I. Drinking Water Supply- Ensure that communities maintain authority to protect all drinking water supplies, including for private wells and aquifers. Provide assurance that communities can use land use or public health bylaws to create regulations for drinking water supply protection.

Thank you for your consideration.

Sincerely,

Brittany Gravely
98 Sheridan St. #2
Jamaica Plain, MA 02130