

[Our original comments](#) from June 7th

Public Comments for Oct 31th deadline

October 31, 2025

BY ELECTRONIC MAIL ONLY

EnergyPermitting@mass.gov

Secretary Rebecca L. Tepper
Executive Office of Energy and Environmental Affairs
Saltonstall Building
100 Cambridge St #900
Boston, MA 02114

RE: Draft Guidance for Site Suitability Assessments For Clean Energy Infrastructure
FROM: [ORGANIZATIONS]

Dear Secretary Tepper,

Thank you for the opportunity to comment on the **Draft Guidance for Site Suitability Assessments for Clean Energy Infrastructure**. We represent a broad range of environmental and climate advocates and organizations from across the state.

We take the position that Massachusetts needs forests, farms, solar, and community empowerment. We cannot heal the climate crisis without forests to provide clean air, water, and livable temperatures. We cannot survive without rainfall from forests and without farms to feed us. We cannot heal the climate crisis without clean energy, and in the current political situation, that's solar. We need to support solar deployment and end our reliance on polluting infrastructure, especially in light of federal threats to solar and all clean energy.

We advocate for making it easier to build small-scale distributed solar projects and environmentally responsible siting of solar and battery storage, prioritizing the already built and disturbed environment. We need to address interconnection issues without damaging our critical green and natural infrastructure and without putting extraordinary burdens on environmental justice and rural communities.

We insist that community stakeholders be fully informed about all potential impacts and have the right to provide directional input before an application is submitted. We also need a

strong cumulative impact assessment that takes into account all aspects of public health, especially for environmental justice communities.

This new siting process presents a critical opportunity to address historic injustice, ensure that the transition to a clean energy future is equitable and just, and solidify our commitment to growing clean energy while honoring our natural world and local community knowledge. To fulfill this promise, EEA must make the following changes to its site suitability guidelines:

- **Strengthen standards:** Site suitability, mitigation, and health and safety standards should be in regulations rather than in guidelines, which have no force of law.
- **Fully account for the value of forests:** Site suitability scoring for forests should be based on more than carbon sequestration. It should account for other benefits from forests, especially regional rainfall regulation (affecting drinking water, and water for agriculture) and regional air-temperature regulation. We recommend using USDA Forest Service's [*National Forests to Faucets 2.0 Assessment*](#) and other appropriate science-based resources for developing forests watershed value scoring.
- **Ensure scoring integrity:** The Site Suitability Score Reviewers (third-party entities retained by the Commonwealth) must be more than rubber stampers. They should have the experience, obligation, and authority to gather and verify information on site or designate a circuit rider to do so.
- **Prohibit development on unsuitable sites:** Towns should be able to reject projects with an “unsuitable, high impact” site suitability score (greater than 4.0).
- **Limit mitigation and involve communities:** In areas within a 2-mile radius of a distribution feeder connected to a substation with newly upgraded or available capacity for additional solar, projects with “highly suitable,” “suitable,” or “moderately suitable” scores (0.0-3.0) should allow reasonable mitigation measures that the community participates in deciding on. In areas without interconnection, there should be no mitigation allowed. These site-suitability regulations should also apply to the siting of new substations.
- **No “pay to play”:** Projects with “not very suitable” or “unsuitable” site suitability scores (all projects greater than 3.5) should not be allowed to move forward, regardless of mitigation payments. For projects “not very suitable, moderate to high impact” local community input must be considered. If watershed and regional cooling impacts are not incorporated into site scoring, Key Stakeholders (including municipalities and community residents) should be allowed to appeal projects in areas where watersheds and regional cooling impacts have not been assessed.
- **Reform scoring to ensure meaningful social and environmental benefits:** To apply for a social and environment benefit criteria score subtractor, an applicant should develop a community benefit agreement following the Office of Environmental Justice & Equity's (OEJE's) guidance. Benefits should be designed with communities, not ascribed by host

municipalities. OEJE's guidance contains strong recommendations around community engagement and co-creation of meaningful benefits. Without following the guidance, the proposed eligible subcontractors have the potential to be insignificant and misaligned with community priorities. For example, how much utility bill assistance is considered significant enough to earn a point? A CBA process promotes alignment with benefits that make a difference. To ensure enforceability and accountability, the CBA should be certified with the host municipality. If a CBA is not incorporated into the site suitability process, benefit criteria score subcontractors should only include benefits that address social and environmental burdens identified through MassEnviroScreen. For example, benefits as vague as "Funds publicly available EV charging stations" or "Creates or maintains local jobs" should not directly offset risks to agricultural resources, biodiversity, or climate change resilience.

Together, these measures will further equity, build community trust, and protect our natural environment while accelerating our renewable energy buildout. Please make these changes.

Sincerely,

Alliance for Health and Environment
Alternatives for Community & Environment
Berkshire Environmental Action Team (BEAT)
Birchwood Sustainable Development
Brookhaven Residents' Climate Change Committer
Canton Residents for a Sustainable Equitable Future
Chair, Dalton Democratic Town Committee
Church of the Covenant
Clean Water Action
Climate Code Blue
Community Land & Water Coalition, Inc.
Concerned Citizens of Franklin County
First Parish UU of Medfield Green Sanctuary Committee
Green Dalton Committee
Jancek Home Improvements LLC
Longmeadow Energy and Sustainability Committee
Longmeadow Pipeline Awareness Group
Lutherans Restoring Creation
Massachusetts Climate Action Coalition
Massachusetts Mothers Out Front
Massachusetts Citizen
Member of town energy and resilience committee

Mothers Out Front Massachusetts
Partnership for Policy Integrity
Pipe Line Awareness Network for the Northeast
Progressive Massachusetts
Responsible Solar Massachusetts
RESTORE: The North Woods
Revitalize CDC
Save Massachusetts Forests
Sierra Club Massachusetts
Solar United Neighbors
South Coast Neighbors United
Third Act MA
UU Society of Fairhaven Green Sanctuary Team
Worcester Congregations for Climate and Environmental Justice