



Comments on Massachusetts Executive Office of Energy & Environmental Affairs (EEA) Draft Guidance for Site Suitability Assessments for Clean Energy Infrastructure

Prepared for: Environmental Defense Fund

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October 2025



TABLE OF CONTENTS

Executive Summary	2
Structure: Effective & Appropriate.....	2
Social & Environmental Benefits: Signed Agreement Requirement.....	3
Sample Assessment: Plymouth County Battery Storage	3
Climate Resilience.....	5
Carbon Storage	5
Biodiversity.....	5
Agricultural Resources	5
Social and Environmental Burdens.....	5
Development Potential	6
Social and Environmental Benefits.....	6
Social & Environmental Burden: Mapping Methodology	6
Integration with Other Proposals	7
RECOMMENDATIONS: Compiled	7

About the Author

Energy Futures Group (EFG) is a clean-energy consulting firm based in Hinesburg, Vermont, with 15 years supporting regulators, agencies, utilities, and advocates across 45 U.S. states, eight Canadian provinces, and Europe. We specialize in designing, implementing, and evaluating programs and policies that promote energy efficiency, renewable and distributed resource investment, affordability, and strategic electrification. EFG offers deep expertise in utility system assessment and resource planning, including integrated resource planning (IRP), distributed energy resource (DER) forecasting, and scenario analysis. Our team has evaluated hundreds of clean energy programs and contributed to the development of nationally recognized initiatives. We also provide expert witness testimony on energy efficiency and utility planning in regulatory proceedings throughout North America. EFG's work continues to shape utility filings, inform policy decisions, and drive the success of clean energy deployment.

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Acknowledgements

These comments and supporting analyses were prepared by EFG on behalf of Environmental Defense Fund. Any omissions or errors in the report are the responsibility of the EFG team.

EXECUTIVE SUMMARY

The Draft Guidance for Site Suitability Assessments for Clean Energy Infrastructure offers a well-structured framework to evaluate energy facility siting, with strong integration of state-specific tools and criteria. In these comments, we provide a sample assessment of a battery storage project in Plymouth County, which confirms the usability of the scoring system and highlights areas where clarity would enable more equitable and climate-aligned infrastructure development. Specific recommendations are included at the end of this document.

STRUCTURE: EFFECTIVE & APPROPRIATE

Overall, the proposed guidance for Site Suitability Assessments reflects a thoughtful approach to evaluating facilities. In particular, the proposal is strengthened by its reliance on up-to-date state-specific assessment tools. Below, we outline specific structural elements and what undergirds their use:

- The criteria addressing **Climate Change Resilience, Carbon Storage and Sequestration, Biodiversity, and Agricultural Resources** appropriately weight scoring toward natural systems, which are particularly important when determining site suitability for the subset of projects to which this guidance applies (clean energy facilities with footprints over one acre in areas not identified as burdened). These criteria are **not sufficient to assess projects in historically overburdened areas**, discussed on page 7.
- **Development Potential** is clearly articulated and well balanced. In particular, the inclusion of a waiver process for transmission and distribution allows for grid improvements in cases where suitable locations may be substantially limited.
- The use of a subtractive scoring approach for **Social and Environmental Benefits** is consistent with best practices for assessing energy and environmental justice benefits. Below, we provide recommendations for strengthening this approach by mandating appropriate documentation of such benefits.
- **Social and Environmental Burdens** are tied to the MassEnviroScreen tool, which should ensure standard assessment across all state activities. We provide a recommendation for clarifying the language around census locational data which would guarantee appropriate application in practice.
- The inclusion of **Other Considerations** as unscored elements allows the Energy Facilities Siting Board (EFSB) to acknowledge key qualitative factors without introducing subjectivity into the scoring framework. For example, considerations of noise impacts.
- Finally, the assessment appropriately identifies where action is necessary, but its success depends on well-documented and collaboratively developed **mitigative measures**.

SOCIAL & ENVIRONMENTAL BENEFITS: SIGNED AGREEMENT REQUIREMENT

As noted, we support the proposed subtractive approach to incorporate social and environmental benefits. The guidance provides a useful illustrative example of a signed agreement and in one section lists a requirement that all benefits have such documentation. However, this requirement is neither clear nor practically applied. We recommend that EEA affirmatively require a documentation of each benefit and provide relevant examples to reduce the need for case-by-case consideration. Otherwise, the EFSB could spend substantial energy adjudicating the jurisdiction of parties claiming benefits.

TABLE 1. Proposed Example Documentation for Social and Environmental Benefits

Benefit	Example Documentation or Agreement
Local Habitat	Signed agreement, confirmed by municipal conservation or planning commission or equivalent body
Outdoor Air Quality	Documentation of displaced emitting source provided by relevant utility or site owner
Recreation	Signed agreement with municipal city council, selectboard, economic development board, or planning commission
Public EV Charging	Signed contract for construction of site or provision of funds
Bill Reductions	Documentation of bill reductions provided by relevant utility
Cultural Easements	Deed of easement or relevant restrictive covenant
Local Jobs	Signed Collective Bargaining Agreement or guaranteed employment contracts for specific term
Pollinator-Friendly	Signed agreement with municipal conservation commission or equivalent body

SAMPLE ASSESSMENT: PLYMOUTH COUNTY BATTERY STORAGE

To assess the usability and appropriateness of the proposed scoring criteria, we applied the guidance to a mock-up project informed by existing storage installations and representative sample sites. The hypothetical project is sited adjacent to existing energy infrastructure on eight acres approximately twelve miles inland in Plymouth County. Using this illustrative example enables us to evaluate the criteria and troubleshoot any issues assessing site suitability. Please find the sample scoring table below, followed by an explanation of findings.

TABLE 2. Sample Site Scoring

Site Suitability Criteria	Points	Notes
Climate Resilience Highest Exposure Rating for riverine and/or coastal flooding	2	There are several sites in Plymouth County where there is a high-level of riverine flood risk. Coastal flooding for an inland project is reduced. Utilizing the ResilientMass Climate Resilience Design Standards Tool, we assess a Low Exposure risk to riverine flooding at our sample site.
Carbon Storage Land Cover (NCLD) Ecosystem Carbon Index (NFCMS)	1	We estimate an average value of 100 M _G CO ₂ e/acre at the sample site using the National Forest Carbon Monitoring System 2070 dataset. Given this is Undeveloped Open Space and the value is less than 200 M _G CO ₂ e/acre, the estimated score is 1.
Biodiversity BioMap NHSEP Priority Habitats CAPS Index of Ecological Integrity	0.2	The sample site is not in any BioMap areas or NHSEP Priority Habitats. Some sites in Plymouth County are in those territories, but there are many viable sites that are not. The sample site scores at around 0.2/2.0 on the CAPS Index of Ecological Integrity, which puts it in the lowest 25% areas in the state.
Agricultural Resources Farmland Soils Land Cover	0	This area is categorized as Other Undeveloped and is not categorized as Agriculture. There are few sites in Plymouth County which would score here.
Social and Environmental Burdens MassEnviroScreen	3	The sample site scores a 55 on the MassEnviroScreen tool, equivalent to a 3/5 for this criterion. As such, Social and Environmental Burdens could be considered by the EFSB for mitigation.
Scoring Modifier	Points	Notes
Development Potential Eligible Land Re-use DPU CIP Program Protected Open Space	0	This site is not an eligible reuse of land, nor is it covered in the DPU Capital Investment Project Provisional Program. The site footprint does not overlap with Protected Open Space.
Social/Environmental Benefits Full list provided above	-1	The sample project considered does not have any signed agreements to provide social or environmental benefits. However, it does create local jobs, and if those roles were covered by a formal Collective Bargaining Agreement or signed contract, they could be considered a benefit equivalent to one point.
Total	5.2	

Climate Resilience

Assessing the climate resilience of the sample site was straightforward and indicates an appropriate level of risk tolerance. As flooding risk increases, it is critical that all sites be assessed for their resilience. While this site does not have a score so high as to warrant a mitigation discussion, the criterion would allow the EFSB to require reasonable mitigations for highly flood-prone areas.

Carbon Storage

This criterion brings a critical consideration into the site suitability assessment, namely whether a proposed project will substantially impact the natural landscape's ability to sequester carbon. For our sample site, this score reflects that the site, though adjacent to existing infrastructure, does have some existing forested area that would be impacted by the project, though the impact is not so high as to require any mitigative efforts.

While we support this criterion, the process for determining the appropriate carbon index is quite difficult given existing tools. There are several different tools and datasets to assess and understand both NCLD and NFCMS data, and none that we were able to find easily allow a use to pull the MGC02e/acre for the 2070 assessment alone. Further, the averaging approach recommended is unclear and difficult to implement given the public tools available. We recommend that, if implemented, EEA clarify the specific dataset and recommended tool and provide a video tutorial on determining this value.

Biodiversity

We support the incorporation of this criterion and the use of the UMass EcoAssess tool for verification. For our sample site, it was unlikely that, given its proximity to existing infrastructure, it would score highly here. For other projects that are in less developed areas, this would give the EFSB a productive opportunity to explore mitigative approaches to reducing impact on wildlife. We recommend that EEA clarify which index of ecological integrity to use as reported by the UMass EcoAssess Tool (e.g., All Region or Best State).

Agricultural Resources

Our sample site does not sit on agricultural land, but the proposed determination methodology is clear and appropriate.

Social and Environmental Burdens

Our sample site scored at a 55 on the MassEnviroScreen scale. Given that sites that are substantially burdened will be addressed in the Cumulative Impacts Study and not via this assessment, a score of 3 is likely one of the higher scores that a site might receive via this method. More information on potential mitigative approaches in this section would be useful.

It would be interesting to explore whether the incorporation of subtractive social and environmental benefits could reduce any required mitigative actions in this category.

Development Potential

Our sample site has no negative or positive adders under development potential. Storage projects are occasionally proposed on brownfield, landfill, or previously developed lands, which would provide a negative five subtractor. We would note that, in such cases, those sites would likely score low on many of the scored criterion above so that could be an area for potential double-counting. From a practical standpoint, the MassMapper tool was easy to use to determine Openspace coverage. We support the proposed waiver for transmission and distribution infrastructure facilities, given that impacts on protected open space can be reduced

Social and Environmental Benefits

Our sample site scores one subtractive adder, which assumes that the local labor they create work under a Collective Bargaining Agreement. While many projects create local labor, the signed Collective Bargaining Agreement for this project would ensure stability, fair wages, negotiated benefits, and workplace safety. Our expectation is that some projects that are currently underway will have difficulty providing signed and documented agreements related to these benefits. However, with the implementation of these assessments, we expect that developers would be able to prepare and develop municipal and other relationships ahead to ensure documentation of benefits.

SOCIAL & ENVIRONMENTAL BURDEN: MAPPING METHODOLOGY

We recommend a refinement to the methodology used to assess Social and Environmental Burdens, specifically regarding the treatment of census block groups:

Each facility should be evaluated by overlaying the full site footprint on the Massachusetts Environmental Justice Screening Tool (MassEnviroScreen) map to identify all intersecting census block groups, as currently recommended. Subsequently, rather than applying a weighted score based on the percentage of the site footprint within each block group, we recommend that the score be determined using the weighted score of all census block groups within the tract where the facility is located. This approach is consistent with the design of the MassEnviroScreen tool, which operates at the block group level. This method also acknowledges that the social and environmental burdens of energy infrastructure are not confined to the immediate footprint of the facility. Impacts often extend beyond the site boundary, and a tract-level assessment better captures the overall impact.

MINIMIZATION & MITIGATION

The proposed assessment's strength lies in its ability to pinpoint where mitigation and minimization measures are most needed, by criterion. As such, its success depends on rigorous oversight and implementation. As discussed above, scored social and environmental benefits must be documented and developed in partnership with affected parties. All identified measures should follow the same approach – clear documentation and collaborative development. Without it, the assessment is unlikely to yield appropriate responses to impact.

INTEGRATION WITH OTHER PROPOSALS

These comments relate only to the proposed Site Suitability Assessment and not to the other proposed regulations across all Commonwealth agencies. It is important to note that we reviewed this guidance only in relation to use for projects proposed in historically unburdened areas. This site suitability assessment is not sufficient to measure the future impacts and any necessary mitigation for projects proposed in historically overburdened areas. We strongly recommend that this assessment remain separate from the Cumulative Impact Analysis process under development by EEA's Office of Environmental Justice and Equity (OEJE).

RECOMMENDATIONS

- Maintain the overall scoring structure as proposed, with refinements as recommended.
- Affirmatively require a documentation for each social and environmental benefit.
- Provide relevant examples of documentation to reduce the need for case-by-case consideration. See Table 1.
- Clarify the specific dataset, metric, and mapping tool used to determine carbon sequestration metrics. Provide video training on approach.
- Clarify which index of ecological integrity to use as reported by the UMass EcoAssess Tool (e.g., All Region or Best State) to determine Biodiversity score.
- Maintain the subtractive approach for Social and Environmental burdens and, when possible, provide guidance on potential mitigative approaches.
- Maintain the waiver for transmission and distribution infrastructure under Development Potential.
- Refine the methodology for scoring Social and Environmental Burdens. Recommend a weighted average across the census tract rather than across the block group to better reflect potential impacts beyond the site footprint.
- Ensure that all mitigation and minimization measures are well documented and collaboratively developed.
- Do not integrate this assessment as a tool for assessing proposed projects in historically overburdened areas. Rather, rely on a robust Cumulative Impact Assessment as a tailored approach.