

**Conservation Commission
Meeting Materials, as of October 8, 2026**

Public Hearing

- **NOI #2026-07 – Notice of Intent**, filed by **Joshua Goldman** for the proposed construction of a new single-family house and attached accessory dwelling unit, and associated site improvements, such as driveway access, utility connections, site grading, and drainage at **0 Meadow Road, identified as Assessor's Map 50, Lot 02** within the Riverfront Area of the Connecticut River. **CONTINUED FROM SEPTEMBER 10, 2026**
 - DEP File #
 - Email from Conservation Agent
 - Previously submitted proposed site plan

New Business:

- Eversource's proposed WT-11 Transmission Right-of-Way Reliability Program (TRRP) Project:
 - [Eversource's Project Page](#) (hyperlink)
 - [MEPA Environmental Monitor Page](#) (hyperlink)
 - Eversource WT-11 Public Meeting Presentation (enclosed)
 - Submitted Public Comments (enclosed)
- New consolidated local permitting process for small clean energy projects under 225 CMR 29.00
 - DOER MAPC MWRCSSWAP Webinar 7.09.2026-Slides (enclosed)
 - 225 cmr 29.00 muni faq (enclosed)
 - 2026_0716_Email Response from DOER re small vs large (enclosed)



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
WESTERN REGIONAL OFFICE
436 DWIGHT STREET, SPRINGFIELD, MA 01103 413-784-1100

MAURA T. HEALEY
Governor

KIMBERLEY DRISCOLL
Lieutenant Governor

REBECCA L. TEPPER
Secretary

BONNIE HEIPLE
Commissioner

DATE: October 1, 2026

Municipality MONTAGUE
(city/town)

RE: NOTIFICATION OF WETLANDS PROTECTION ACT FILE NUMBER

The Department of Environmental Protection has received a Notice of Intent filed in accordance with the Wetlands Protection Act (M.G.L. c. 131, §40):

Applicant: JOSHUA GOLDMAN
Address: 71 MAIN STREET
MONTAGUE, MA 01351

Owner:
Address:

LOCUS: 0 MEADOW ROAD

This project has been assigned the following file # : WE 229-0275

A FILE NUMBER ONLY INDICATES THAT THE APPLICATION CONTAINS THE MINIMAL SUBMITTAL REQUIREMENTS AND IS ADMINISTRATIVELY COMPLETE - NOT THAT THE INFORMATION IN THE APPLICATION IS ADEQUATE FOR ISSUANCE OF AN ORDER OF CONDITIONS.

Although a file # is being issued, please note the following:

No comments.

If you have any questions regarding this letter, please contact: THOMAS GRUSZKOS @ (413)-755-2260

Cc: Montague Conservation Commission, ONE AVENUE A TURNERS FALLS, Montague, MA, 01376
Representative: Stokes and Company, 20 Turkey Hill Road, WESTHAMPTON, MA, 01027

JOSHUA GOLDMAN
71 MAIN STREET
MONTAGUE, MA 01351

NOI #2026-07 – Notice of Intent, filed by Joshua Goldman - Email from Agent

From: [Maureen Pollock](#)
To: ["Tim Stokes"; "Gruszkos, Thomas \(DEP\)"](#)
Cc: ["Ward Smith"](#)
Subject: RE: WPA FNC for Goldman, 0 Meadow Road, Montague (MassDEP File No. 229-0275)
Date: Monday, October 5, 2026 11:31:00 AM
Attachments: [GOLDMAN 99 SITE PLAN.pdf](#)

Hi Tim,

Just checking to see if you received my email from Friday. See below. Please confirm and submit, accordingly.

As I review again the submitted site plan (see attached), it appears that the project site has 16-feet of depth along the front yard that seems reasonable, workable, and financially viable to re-configure the proposal, so that some or all of the proposal is built outside of the Riverfront Area. As stated below, the Conservation Commission chair has asked that the applicant reduce the proposal so that all work would be outside of the Riverfront Area. Please submit the site plan, accordingly.

Additionally, please update the site plan to show the proposed septic system location and updated limit-of-work and erosion and sedimentation controls for all construction, including the proposed septic system.

Additionally, please submit a landscape plan, showing and listing plant species name and quantity. Additionally, the Commission is likely to ask where is the limit of mowing. I suggest adding the “no mow line” to the landscape plan.

Additionally, during the September 10 public hearing, you showed the Commission the locations of the proposed soil stockpile area and staging area via your computer screen. This document has not been submitted to the Commission, as of yet. Please submit accordingly.

Sincerely,

Maureen

Maureen Pollock (she/her)

Planning Director

Town of Montague

Department of Planning & Conservation

1 Avenue A

Turners Falls, MA 01376

Phone: (413) 863-3200 x 112

Web: www.montague-ma.gov/planning

Email: mpollock@montague-ma.gov

From: Maureen Pollock

Sent: Friday, October 2, 2026 12:10 PM

To: Tim Stokes <stokesbuilders@gmail.com>; Gruszkos, Thomas (DEP) <thomas.gruszkos@mass.gov>

Cc: Ward Smith <ward.ves@gmail.com>

Subject: RE: WPA FNC for Goldman, 0 Meadow Road, Montague (MassDEP File No. 229-0275)

Hi Tim,

As requested by the Conservation Commission at the September 10th meeting, please submit an updated site plan showing the proposed septic system.

Also, the Conservation Commission chair Mark Fairbrother stopped by my office yesterday. He requests that you submit a landscape plan. In addition of showing the proposed planting, he asks that the landscape plan also show where the limit of mowing would occur aka "no mow line".

The Conservation Commission chair also asked that the applicant reduce the proposal so that all work would be outside of the Riverfront Area.

I will be posting the agenda on Monday. This continued public hearing is scheduled for 6:30pm on Thursday, October 8 in the Town Hall Annex and via Zoom. I will email you the agenda on Monday.

Thanks,

Maureen

Maureen Pollock (she/her)

Planning Director

Town of Montague

1 Avenue A

Turners Falls, MA 01376

Phone: (413) 863-3200 x 112

Web: www.montague-ma.gov/planning

Email: mpollock@montague-ma.gov

From: Tim Stokes <stokesbuilders@gmail.com>

Sent: Thursday, October 1, 2026 10:33 AM

To: Gruszkos, Thomas (DEP) <thomas.gruszkos@mass.gov>

Cc: Maureen Pollock <mpollock@montague-ma.gov>; Ward Smith <ward.ves@gmail.com>

Subject: Re: WPA FNC for Goldman, 0 Meadow Road, Montague (MassDEP File No. 229-0275)

Thanks Tom,

I'm a fan of e-filing too, but the DEP site was down on the day we filed, 8/26. Thanks for getting us a file #

On Thursday, October 1, 2026, Gruszkos, Thomas (DEP) <thomas.gruszkos@mass.gov> wrote:

Good morning,

Attached are the Wetlands Protection Act File Number comment letter (no comments) from MassDEP pertaining to the project proposed by Goldman at [0 Meadow Road, Montague](#) (MassDEP File No. 229-0275).

The check cleared Monday 9/28/2026, thanks for the reminder to review the status. As an FYI for Tim, our now retired circuit rider Mark Stinson used to be a strong advocate for using eDEP, I believe part of the reason is that when you submit an NOI in eDEP you're able to process the permitting fee online and avoid any wait time. If you're interested and would like help setting up an account, please let us know. The website is [eDEP - MassDEP's Online Filing System](#)

Please let me know if you have any questions, comments, or concerns.

Thanks,

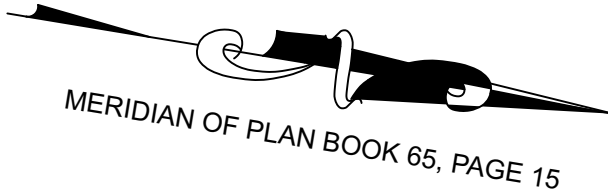
Tom Gruszkos | Environmental Analyst
Massachusetts Department of Environmental Protection
[436 Dwight Street, Springfield, Massachusetts 01103](#)
Mobile: (617) 352-2064

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Thanks, Tim Stokes

Stokes And Company

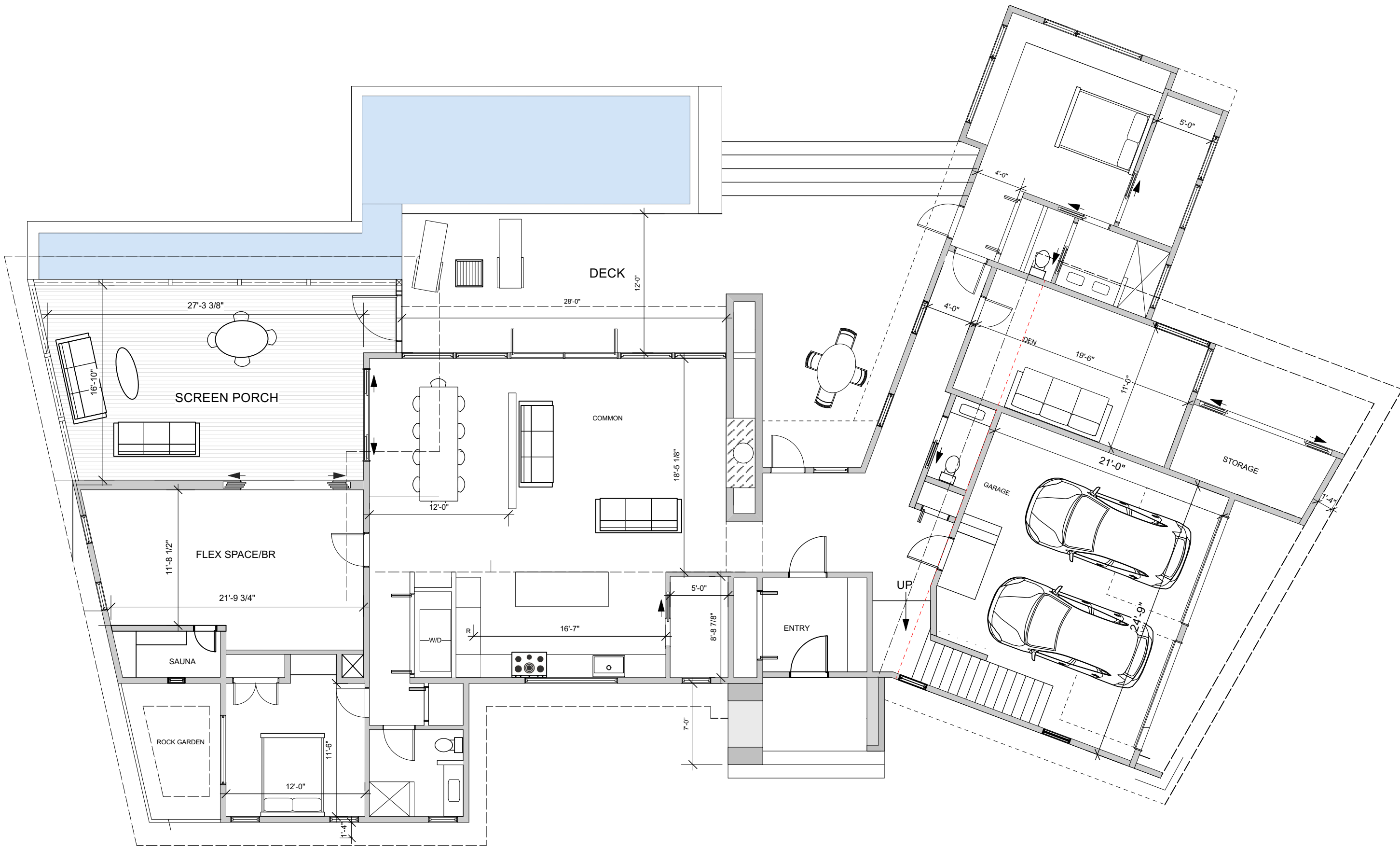
www.stokesbuilders.com



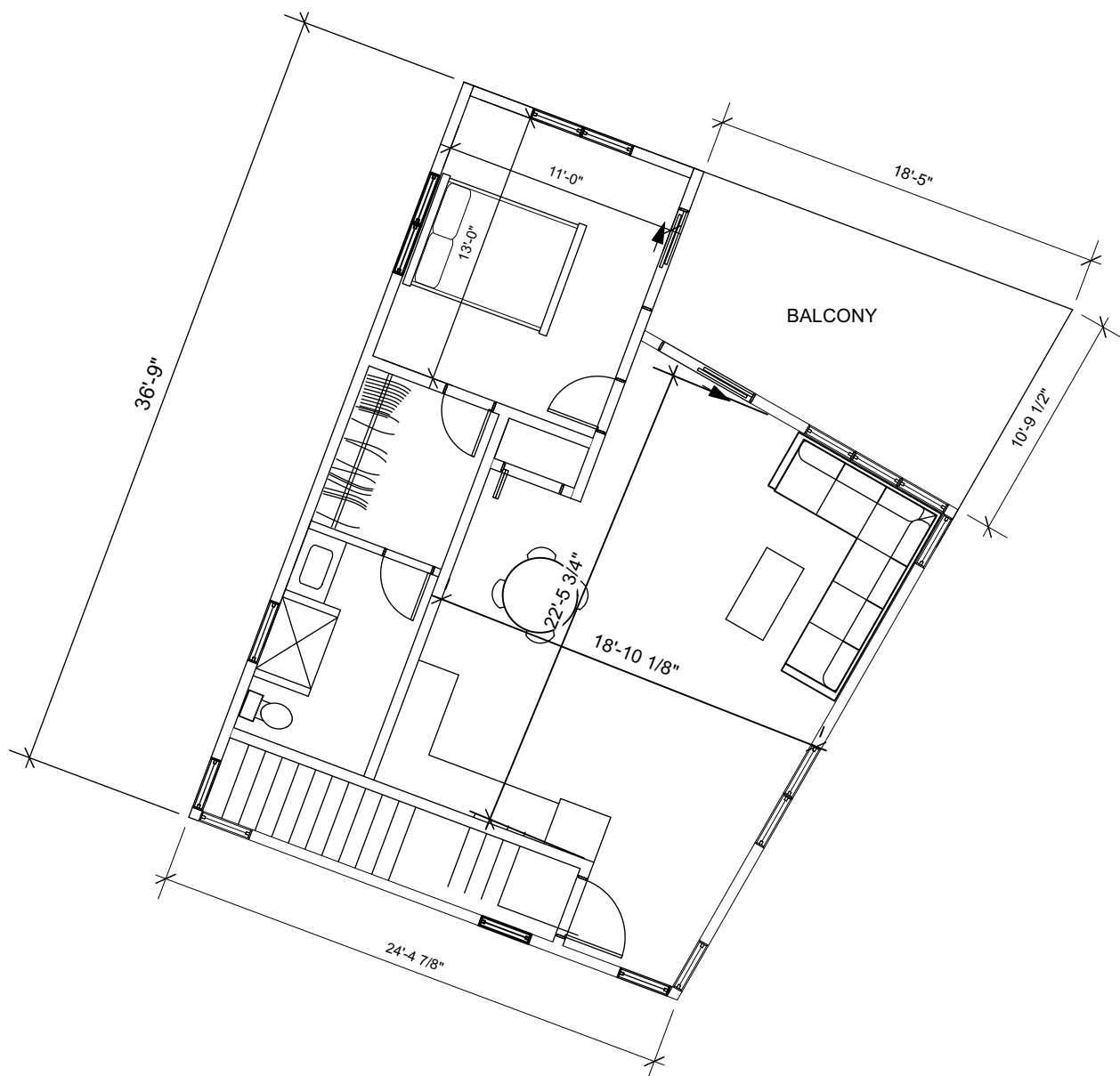
LEGEND

- FOUND IRON PIN
- IRON PIN TO BE SET
- FOUND CONCRETE BOUND
- FOUND STONE BOUND
- ⋈ UTILITY POLE
- EXISTING WELL
- △ UNMARKED POINT

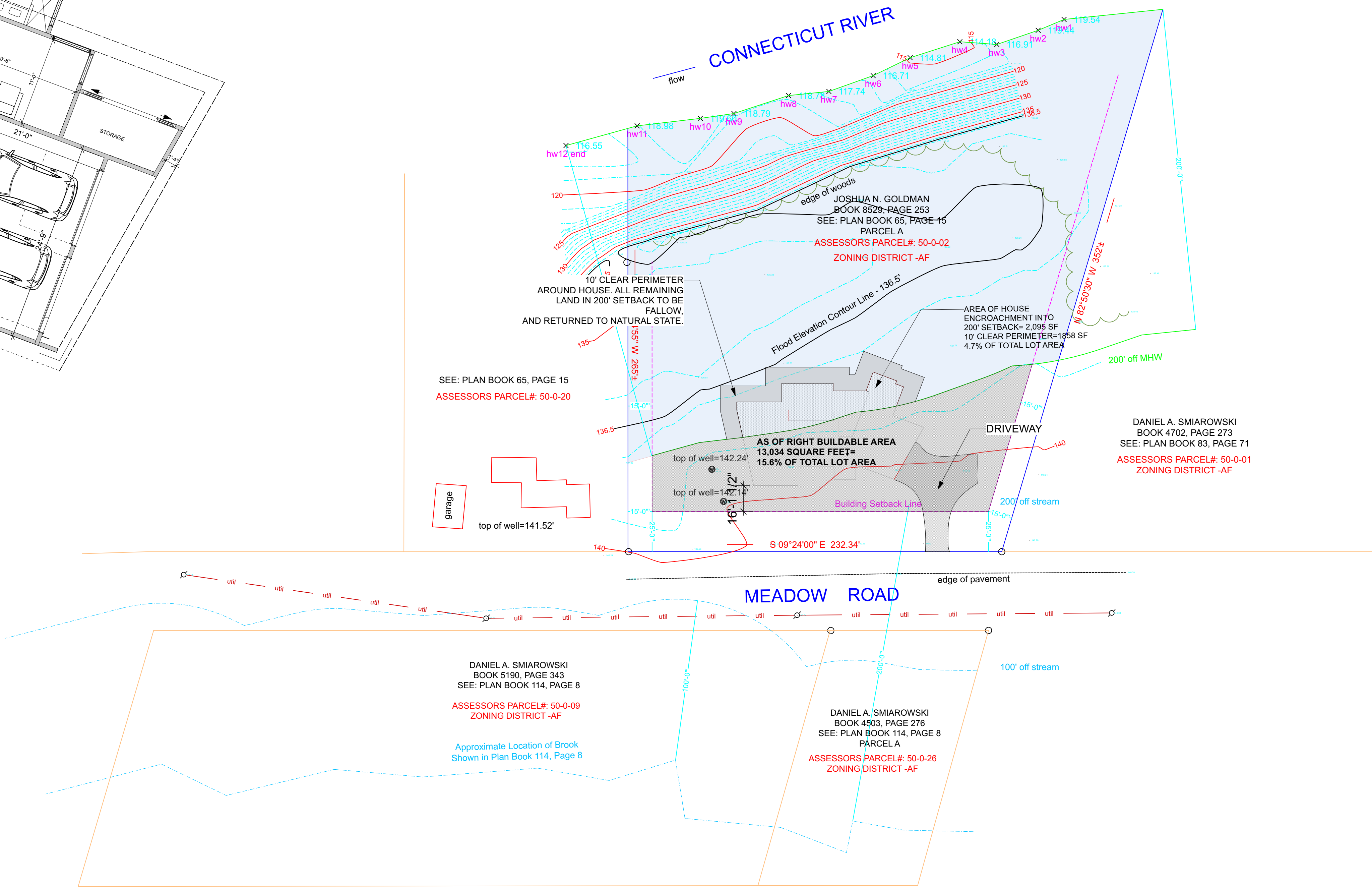
AREA OF PARCEL IN 200' RIVER SETBACK



FIRST FLOOR PLAN



2ND FLOOR APARTMENT PLAN



ELEVATIONS ARE BASED ON VERTICAL REFERENCE MARK RM1 (ELEVATION 127.31' - NGVD)
SHOWN ON FLOOD MAP NUMBER 250122 0009 C. BASE FLOOD ELEVATION AT LOCUS=136.5±



"SITE PLAN"
PLAN OF LAND IN
MONTAGUE, MASSACHUSETTS
PREPARED FOR
JOSHUA N. GOLDMAN

SCALE: 1"=40' MARCH 10, 2026
HAROLD L. EATON AND ASSOCIATES, INC.
REGISTERED PROFESSIONAL LAND SURVEYORS
235 RUSSELL STREET - HADLEY - MASSACHUSETTS
413-584-7599 413-585-5976 (fax)
email - info@eatonsurvey.com



Eversource's proposed WT-11 Transmission Right-of-Way Reliability Program (TRRP) Project -
Email with slides

From: [Roberge, Jonathan](#)
To: [Maureen Pollock](#)
Cc: [MAVegMaintenance](#)
Subject: RE: Eversource WT-11 TRRP Discussion
Date: Wednesday, September 30, 2026 5:36:26 PM
Attachments: [image001.png](#)
[WT-11 Public Meeting Presentation 13Apr2026 \(002\).pdf](#)

Hi Maureen,

It was nice meeting with you last week. Attached is the presentation that was shared during the public meeting in Amherst back in April 2026. The presentation provides a general overview of the project. Please note, some information is outdated at this time, particularly the listed FEIR anticipated filing date of Q2 2026, which has passed, and is currently anticipated Dec 2026/ Jan 2027.

Hope this is helpful and please reach out with any questions.

Best,
-Jonathan

Jonathan Roberge, CPESC

Supervisor, Environmental Licensing & Permitting, MA



(o) 860-665-6327; (c) 401-484-2423

From: Maureen Pollock <mpollock@montague-ma.gov>
Sent: Wednesday, September 30, 2026 2:44 PM
To: Roberge, Jonathan <jonathan.roberge@eversource.com>
Cc: MAVegMaintenance <MAVegMaintenance@eversource.com>
Subject: Eversource WT-11 TRRP Discussion

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click! ******

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SPAMFEEDBACK@EVERSOURCE.COM for analysis by our cyber security team.

Hi Jonathan and Conor,

Thank you for meeting with me the other week regarding Eversource's proposed WT-11 TRRP project.

Please provide me with the slides you provided the Town of Amherst, with the updated dates, as applicable.

Once I have the slides, I plan to give the Montague Selectboard a status update. I do not plan to review all the slides at the meeting, but they will be included in the meeting packet.

Sincerely,

Maureen

Maureen Pollock (she/her)

Planning Director

Town of Montague

Department of Planning & Conservation

1 Avenue A

Turners Falls, MA 01376

Phone: (413) 863-3200 x 112

Web: www.montague-ma.gov/planning

Email: mpollock@montague-ma.gov

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Eversource's proposed WT-11 Transmission Right-of-Way Reliability Program (TRRP) Project -
presentation slides

Eversource Vegetation Management Maintenance

WT-11 Transmission Right of Way Reliability Program (TRRP) Project: Western Massachusetts

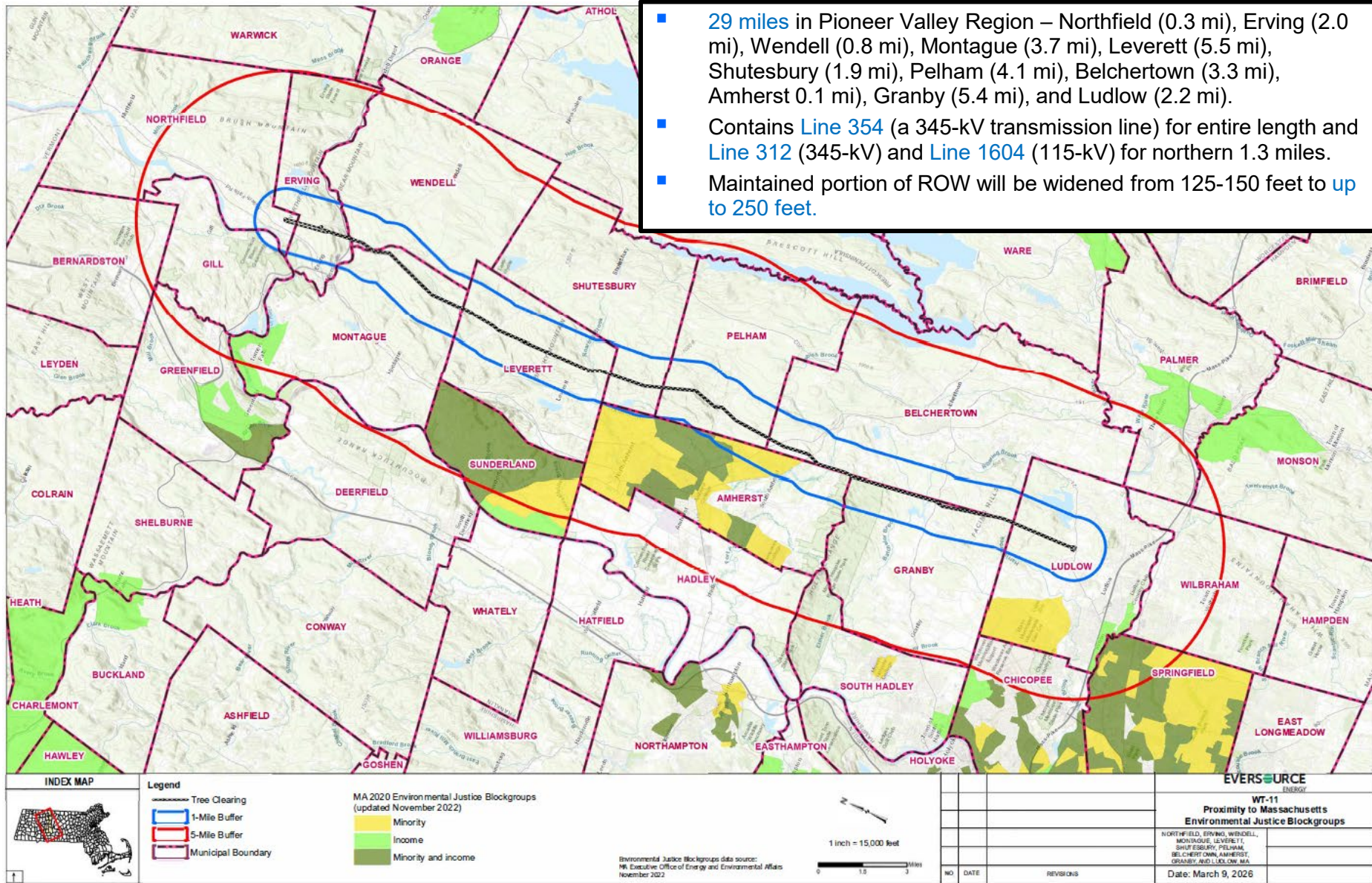
Public Meeting
April 14, 2026

Agenda

April 14, 2026

- Project Introduction
- Alternatives Analysis
- Permitting Overview
- Mitigation
- Public Outreach
- Contact Information

WT-11 Transmission Right-of-Way Reliability Program (TRRP) Project



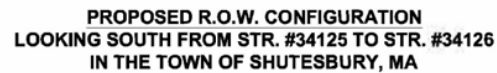
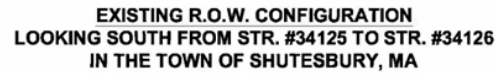
Why is this work needed?

To protect the electric system, we will be removing tall-growing tree species thereby expanding the cleared area of the transmission rights-of-way.

- Transmission Right of Way Reliability Program (TRRP) is a long-term transmission system **reliability and resiliency program** to address more frequent severe weather events, including storms and drought, and increasing insect damage to New England trees.
- Expands the current maintained width of the right-of-way (ROW) to the easement edge or 100' from outer conductors (whichever is less) **to reduce fall in risks.**
- **No work is outside Eversource's existing legal easement.**



EVERSOURCE
ENERGY

[illegible]

Anticipated Program Benefits

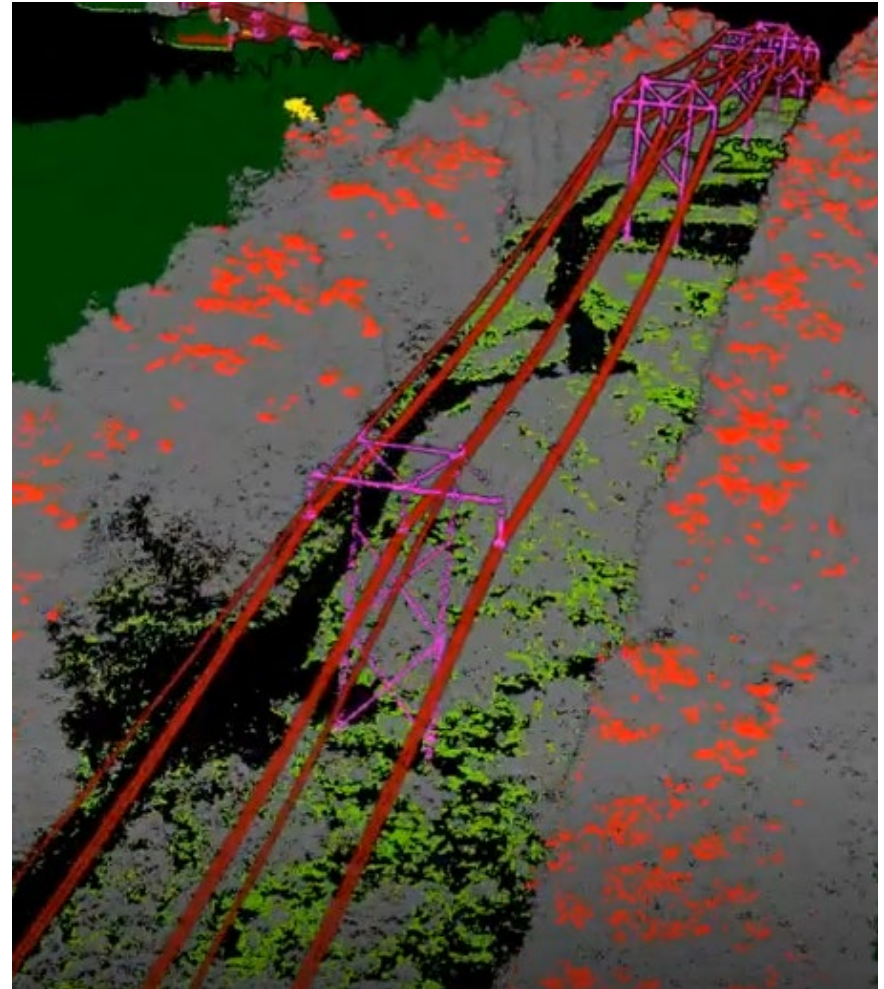
Enhancing Reliability, Increasing Habitats

EVERSOURCE
ENERGY

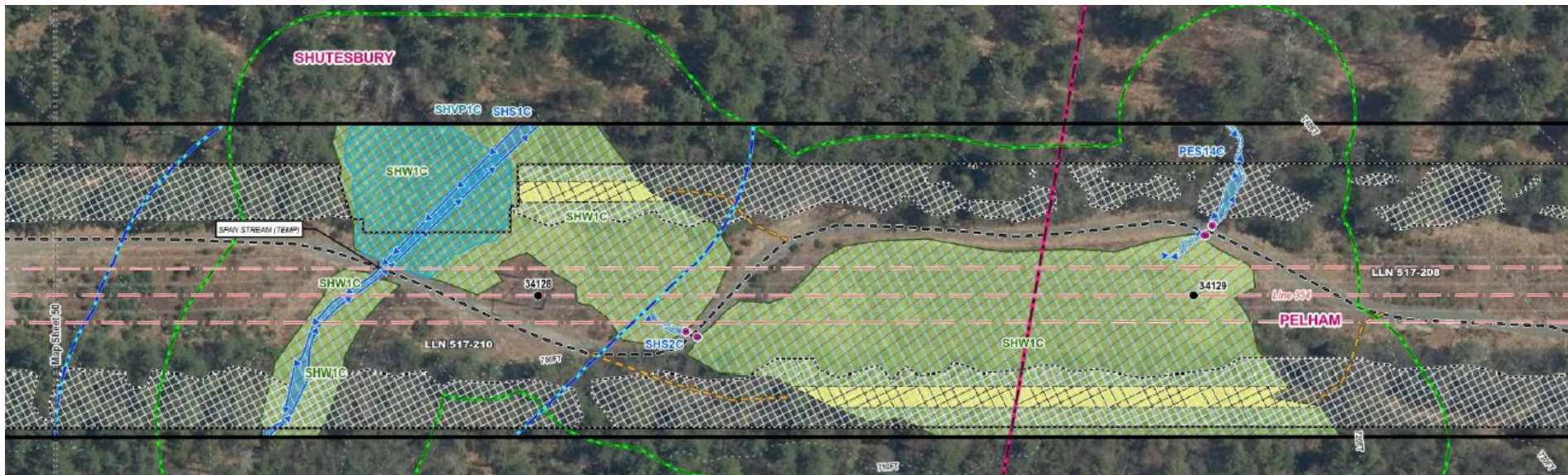


- Increase **reliability and climate resiliency** of the electrical grid by **reducing the risk of fall-ins** along the corridor.
- Expand and **sustainably manage the early successional** habitat of our ROWs which is becoming increasingly rare due to development, but which is **critical for a variety of wildlife**, including numerous pollinators and rare and endangered species.
- Reduce **potential entries into the ROW** and **disturbance to sensitive resources** while making emergency repairs after storm events.

- No Action Alternative
- Transmission Re-build Alternatives
- Targeted Reduction of Tree Removal Widths in Sensitive Areas
- LiDAR Analysis-based Width Modifications
 - 100 feet from outer conductors
 - “100-ft Modified”
- Field reviews to confirm LiDAR analysis



100-ft Modified Alternative



Federal Environmental Permitting:

- U.S. Army Corps of Engineers – Section 404 General Permit
- U.S. Fish and Wildlife Services – Endangered Species Act coordination

State Environmental Permitting:

- EOEEA – MEPA Review:
 - ENF filed June and August 2022 / ENF Certificate issued September 2022
 - DEIR filed August 2025 / DEIR Certificate issued November 2025
 - FEIR anticipated Q2 2026
- DEP – 401 Water Quality Certificate and Wetlands Protection Act
- NHESP – Conservation and Management Permit

Local Environmental Permitting:

- Municipal Conservation Commissions – Wetlands Protection Act and Wetland Bylaws
- Local Stormwater Bylaws, as applicable

- Primary Goal: Meet wetland mitigation and state-listed species mitigation that is required under our permits
- Coordination of mitigation with Kestrel Land Trust, town conservation commissions, MassDEP, and the Natural Heritage & Endangered Species Program
- Priorities:
 1. Permanent land preservation
 2. Focus on **communities** directly impacted by the Project
 3. Focus on mitigation projects with a **benefit to Environmental Justice populations**
 4. Preference to mitigation projects that **benefit multiple environmental resources**
 5. Preference to sites within mapped **Biomap** habitats
 6. **Timing** of funding needs
 7. Mitigation in each **major watershed**

Public Outreach and Opportunities for Public Comment

■ **Massachusetts Environmental Policy Act (MEPA)**

- Advance Notification of ENF provided to Community Based Organizations and tribes in March 2022
- ENF advertised in local newspapers in June 2022
- MEPA Public Meeting and Site Visit held July 2022
- Link to filings is sent to all commenters
- Public comment period: 30 days following publication of the FEIR can be submitted through the MEPA Public Comment portal at:
<https://eeaonline.eea.state.ma.us/EEA/PublicComment/Landing/>

■ **Environmental Justice Community Outreach**

- **Direct Notification:** February 2025 – letters were mailed to all abutters within 1 mile in EJ communities and door hangers left at all EJ community residents directly abutting in the Project in Wendell and Amherst; March-April 2026 – letters were mailed out to all abutters within 1 mile in EJ communities and door hangers left at all abutters within 1-mile in EJ communities in Amherst.
- **Pop-up Events / Community Meetings** - held in EJ communities in May 2022 and January 2025, and planned on April 17, 2026 at Munson Memorial Library (Amherst)

■ **Coordination with trails / open space lands**

■ **Conservation Commission meetings**

- Include notification to project abutters and public hearings



Project website:

<https://www.eversource.com/residential/about/reliability/vegetation-management/transmission-system-vegetation-management-projects/transmission-vegetation-ma/trrp-program-wt-11>

Eversource phone number: [1-888-673-9943](tel:1-888-673-9943)

Eversource email:

MAVegMaintenance@eversource.com

Eversource's proposed WT-11 Transmission Right-of-Way Reliability Program (TRRP) Project - submitted public comments from Jeff Weston of Shutesbury

From: [Walter Ramsey](#)
To: [Maureen Pollock](#); [Fern Smith](#)
Subject: Fw: Report and summary email on Eversource's proposed WT-11 Transmission project
Date: Thursday, September 10, 2026 5:36:30 PM
Attachments: [Letter regarding Eversource's Draft of WT-11.pdf](#)
[Report on Draft of Eversource's WT-11 Transmission Program \(6\) \(1\).pdf](#)

This came from a non-resident. Just forwarding as requested. Distribute to your boards as you see fit. I have not reviewed and this does not reflect a position of myself or the Selectboard.

Walter Ramsey, AICP | Montague Town Administrator | (413) 863-3200 x 110 |
walterr@montague-ma.gov

From: Jeff Weston <jwest5678@yahoo.com>
Sent: Thursday, September 10, 2026 2:11 PM
To: Walter Ramsey <walterr@montague-ma.gov>
Subject: Report and summary email on Eversource's proposed WT-11 Transmission project

Hi Walter,

My name is Jeff Weston and I am a member of the Shutesbury Planning Board.

Thank you so much for taking my call and for giving me your email address. I do very much appreciate your willingness to forward this email with the attached report and summary email about Eversource's proposed project to your Select and Planning Boards as well as to the members of your Conservation Commission.

Eversource's proposed WT-11 Transmission Right-of Way project will affect the towns of Northfield, Erving, Wendell, Montague, Leverett, Shutesbury, Pelham, Belchertown, Amherst, Granby and Ludlow. This broad-based straight cut forest clearing proposed by Eversource would pass through Buffam Falls Conservation Area in Pelham. Portions of the proposed project corridor intersect watershed contributing to important public drinking water supplies. Shutesbury, Pelham and Belchertown lie within the watershed of the Quabbin Reservoir. Also, tributaries to the Atkins Reservoir including Nurse and Dean Brooks flow through areas proposed for substantial tree clearing.

The proposed project would expand the maintained width of an existing 29.3 mile, 345-kV transmission corridor extending from the Northfield Substation to the Ludlow Substation through the above mentioned 11 communities in western and central Massachusetts. According to Eversource's Draft Environmental Impact Report (DEIR), the project would permanently remove approximately 278 acres of forest and permanently alter approximately 371 acres of land including wetlands, riverfront areas, 21 vernal pools, 111.6 acres of Priority Habitat for Rare Species and portions of important public water supply watersheds.

I am hoping that members of your boards will have the time to read the attached report and summary email that I wrote on this project. So far, only the Draft Environmental Impact Report (DEIR) has been written and submitted. The Final Environmental Impact Report (FEIR) is expected to be submitted soon. I am hoping that the members of your boards will feel free to use any information in the the below attachments as they see fit.

If you or they believe that it would be useful to voice your opinions on this project to one or more of the permitting agencies, or to your state representatives, I believe that this would be the time to do so.

If you or they have any questions and or concerns, please feel free to reach out to me via email or by phone at (413) 345-0651.

Thank you very much for your support in this area.

Sincerely,

Jeff Weston

Member, Shutesbury Planning Board

Dear Members of the Montague Select Board, Planning Board and Conservation Commission,

I am writing to ask for your attention to Eversource Energy's proposed **WT-11 Transmission Right-of-Way Reliability Program**, which would substantially expand an existing 29.3-mile transmission corridor through eleven Massachusetts communities.

Reliable electric transmission is essential, and responsible vegetation management is necessary to maintain a safe and dependable electric grid. **The question is not whether Eversource should manage hazardous trees. The question is whether the extraordinary scale and permanent environmental impacts of this particular proposal have been adequately demonstrated to be necessary.**

According to Eversource's Draft Environmental Impact Report (DEIR), the project would expand currently maintained corridor widths of approximately **125–335 feet to 252–576 feet** which would substantially reduce major vegetation management for approximately 40 years. This broad-based straight cut forest clearing would permanently be removing approximately **278 acres of forest** and altering approximately **371 acres of land**. Affected resources include **111.6 acres of Priority Habitat for Rare Species, 21 vernal pools, wetlands, riverfront areas, and portions of important public drinking-water watersheds.**

The historical reliability record makes the scale of this proposal particularly important to examine. Information presented during the public review process indicates that **Line 354, comprising approximately 28 miles of the 29.3-mile project corridor, has experienced no tree-caused outages.** Two tree-related outages, one for 11 hours and 57 minutes and the second for 27 hours and 52 minutes have been identified within the remaining approximately 1.3-mile portion involving Line 312. Yet the information made available does not provide a complete account of the customer impacts associated these events or clearly explain why the two trees responsible could not have been addressed through selective removal, pruning or other measures within a recurring vegetation-management program.

Given this record as well as the greatly improved redundancy, contingency capabilities and operational practices of their contemporary transmission system, Eversource should be required to provide a clear technical demonstration of why corridor expansion on this scale is necessary.

Our review suggests viable and fiscally responsible alternative strategies. Other utilities operating under similar challenging northeastern climatic conditions use combinations of **selective tree removal, pruning, directional pruning, Integrated Vegetation Management, recurring maintenance cycles, and site-specific approaches.** Eversource should clearly demonstrate why comparable, less environmentally damaging approaches would be insufficient along all or portions of this corridor—particularly in environmentally sensitive areas.

There is also the important question of long-term financial and environmental costs.

If substantially widening the corridor would reduce Eversource's recurring vegetation-management costs over the next 40 years, those anticipated savings should be disclosed and compared transparently with the costs of both less environmentally damaging alternatives as well as the current maintenance schedule. It is also important to understand that **Minimizing the**

utility's long-term maintenance expenditures is not the same as minimizing the long-term costs of the project to the Commonwealth and affected communities.

Forests, wetlands, intact watersheds, and other natural systems provide valuable services over many decades, including water filtration and groundwater recharge, erosion and flood control, carbon storage, climate resilience, protection of drinking-water supplies, wildlife habitat, and recreational and community benefits. Permanent forest conversion and degradation of wetland and watershed degradation will carry significant financial as well as environmental costs, some of which may ultimately be borne by municipalities, taxpayers, water suppliers, and landowner for generations to come. **These costs may be difficult to quantify in dollars, but that does not make them any less real—or any less important when weighing the long-term costs and benefits of this project.**

Before final decisions are made, I respectfully ask that the review process require:

- a stronger technical demonstration of project necessity and the engineering basis for the greatly enlarged proposed corridor widths;
- a more comprehensive evaluation of less environmentally damaging vegetation-management and site-specific alternatives including a detailed transparent comparison of the long-term maintenance costs both with and without the proposed 40-year vegetation-management strategy.
- an **independent, interdisciplinary technical review** involving specialists with expertise in transmission engineering, utility forestry, ecology, hydrology, conservation biology, watershed science, and environmental planning; and
- additional opportunities for meaningful public technical discussion.

These requests are not intended to delay necessary transmission improvements. They are intended to ensure that permanent environmental changes of this magnitude occur only after the evidence demonstrates that they are necessary and that reasonable opportunities to reduce their impacts have been fully evaluated.

Massachusetts should not have to choose unnecessarily between a reliable electric grid and responsible stewardship of its forests, wetlands, wildlife habitat, and drinking-water resources. We should expect both.

I respectfully ask you to support a complete and independent technical review of whether the proposed WT-11 expansion is necessary and that it represents the **least environmentally damaging practicable means** of achieving Eversource's reliability objectives.

Thank you for your consideration. I have attached full report for additional information.

Sincerely,

Jeff Weston

Member, Shutesbury Planning Board

Evaluation of Eversource's Draft Environmental Impact Report (DEIR) on the Proposed WT-11 Transmission Right-of-Way Reliability Program

A Review of Project Need, Alternatives, and Environmental Impacts

Prepared by

Jeff Weston

Member, Shutesbury Planning Board

August 2026

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Executive Summary

Reliable electric transmission is essential to the safety, economy, and well-being of the Commonwealth of Massachusetts. Electric utilities have both the authority and the responsibility to maintain transmission corridors in ways that protect public safety and ensure dependable electric service.

This review does not question that responsibility. Rather, it examines whether Eversource Energy's Draft Environmental Impact Report (DEIR) demonstrates that the proposed WT-11 Transmission Right-of-Way Reliability Program is necessary at the scale proposed and represents the **least environmentally damaging practicable means** of achieving its stated reliability objectives.

The proposed project would substantially expand the maintained width of an existing 29.3-mile, 345-kV transmission corridor extending from the Northfield Substation to the Ludlow Substation through eleven communities in western and central Massachusetts. Currently maintained widths of approximately 125 to 335 feet would increase to approximately 252 to 576 feet.

According to Eversource's DEIR, the proposal would permanently remove approximately **278 acres of forest** and permanently alter approximately **371 acres of land**, including **111.6 acres of Priority Habitat for Rare Species**. The affected area includes 34 acres of bordering vegetated wetlands, 44 acres of other wetlands, 21 vernal pools, and portions of important public water-supply watersheds, including the Quabbin and Atkins Reservoirs.

These are substantial and long-lasting environmental impacts. Given their magnitude, the adequacy of the project's technical justification—including a rigorous demonstration of project necessity and a thorough evaluation of less environmentally damaging alternatives—is central to review under the Massachusetts Environmental Policy Act (MEPA).

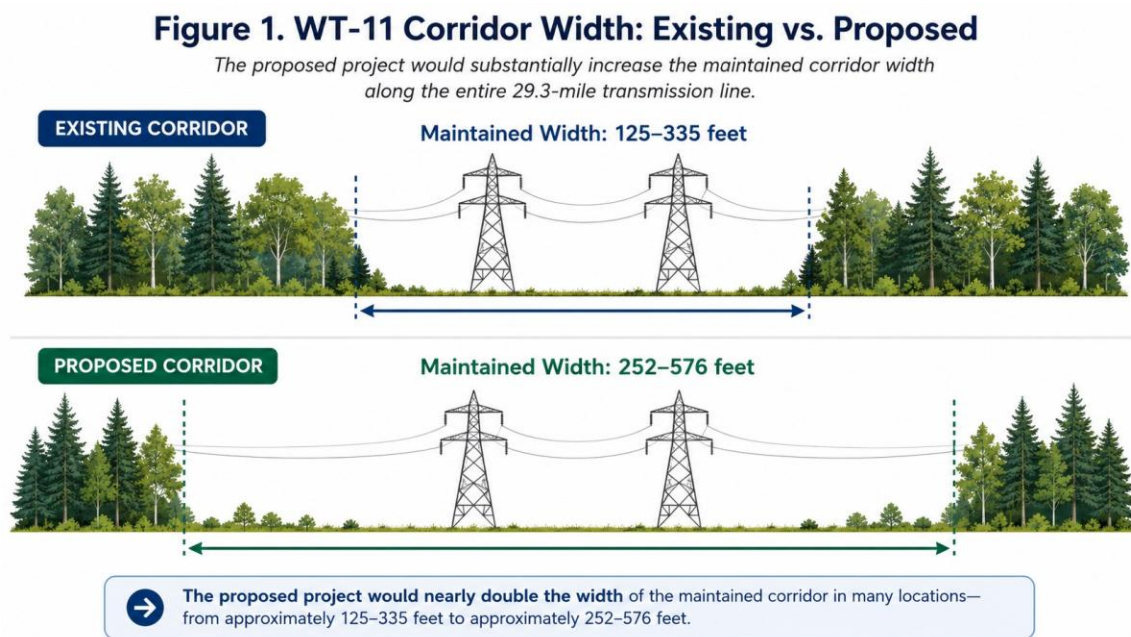
This review therefore examines four principal questions:

1. **Has the current record demonstrated that the proposed corridor expansion is necessary?**
2. **Have less environmentally damaging alternatives been fully evaluated?**
3. **Are the anticipated environmental impacts proportional to the project's stated objectives?**
4. **Has the public review process fully supported informed decision-making?**

The analysis presented in this report raises significant concerns in each of these areas. Among them are whether the DEIR adequately explains the engineering basis for the proposed corridor widths; whether historical transmission reliability supports expansion at the proposed scale; whether selective cutting, pruning, Integrated Vegetation Management (IVM), shorter maintenance cycles, and other practices used by comparable utilities could achieve reliability

objectives with substantially less environmental harm; and whether site-specific approaches could reduce impacts in particularly sensitive areas.

Taken together, these findings support a central conclusion: before the proposed WT-11 corridor expansion proceeds as currently designed, additional evidence and independent technical analysis are needed to demonstrate that the proposed expansion is necessary, that reasonable less-damaging alternatives have been adequately evaluated, and that the project represents the least environmentally damaging practicable means of achieving Eversource's stated reliability objectives.



INTRODUCTION

The WT-11 Transmission Right-of-Way Reliability Program raises an important public-policy question: **How should the Commonwealth ensure reliable electric transmission while protecting forests, wetlands, wildlife habitat, drinking-water resources, and other natural systems that provide lasting public benefits?**

These objectives need not be competing. Environmental review under MEPA is intended to ensure that necessary infrastructure improvements avoid, minimize, or mitigate environmental impacts whenever practicable. The issue is therefore not whether Eversource should maintain its transmission system or remove trees that present genuine hazards. Those responsibilities are fundamental to a safe and reliable electric grid.

The issue is whether a project that would permanently alter hundreds of acres of natural resources across eleven communities has been supported by a sufficiently rigorous

demonstration of necessity, a thorough evaluation of reasonable alternatives, and careful consideration of opportunities to reduce permanent environmental impacts.

The analysis that follows examines the project's demonstrated need, the adequacy of its alternatives analysis, the proportionality of its environmental impacts, and the adequacy of the public review process.

This report is intended to assist regulators, legislators, municipal officials, conservation commissions, and members of the public in considering these issues before decisions affecting significant natural resources are finalized. It is offered in the spirit of constructive environmental review: not to oppose necessary infrastructure improvements, but to encourage decisions grounded in rigorous technical analysis and careful consideration of ways to achieve reliability objectives while minimizing long-term environmental harm.

PRINCIPAL QUESTION 1

Has the Current Record of Transmission Reliability Demonstrated That the Proposed Corridor Expansion is Necessary?

The central question is whether the transmission-reliability record and technical analysis presented in the Draft Environmental Impact Report (DEIR) demonstrate the need for corridor expansion at the scale Eversource proposes.

The DEIR describes the project's reliability goals and proposed expansion of the maintained corridor. However, it does not provide sufficient detail regarding the engineering analyses used to determine the proposed corridor widths, the assumptions underlying those analyses, or why narrower or more site-specific approaches were determined to be insufficient, particularly in environmentally sensitive areas.

Historical system performance is especially relevant to this determination. During the public review process, information presented by Eversource representatives indicated that **Transmission Line 354—which comprises approximately 28 miles of the project's 29.3-mile corridor—has never experienced a tree-caused outage.** Two tree-related outages were identified within the remaining approximately 1.3-mile portion involving Line 312/393.

Secretary Tepper's certificate states that these two outages involving Line 312/393 occurred within the project footprint. These two outages may have occurred just on Line 312. One outage was listed as lasting 11 hours and 57 minutes; the second was listed as lasting 1 day, 3 hours, and 52 minutes.

The information made available by Eversource does not, however, provide a complete account of the customer impacts associated with these events or explain how they informed the design and scale of the proposed corridor expansion. Nor does the DEIR clearly explain why the trees

responsible for these events could not have been identified and addressed through selective removal, pruning, or other measures within a recurring vegetation-management program.

The historical record therefore raises an important question. If approximately 28 miles of this 29.3-mile corridor have reportedly operated without a tree-caused outage, **what evidence demonstrates that broad-scale expansion of the maintained corridor along its full length is necessary to achieve acceptable reliability?**

The analysis should also consider the resilience, redundancy and operational flexibility of the contemporary transmission system. Since mandatory and enforceable NERC Reliability Standards took effect in 2007, transmission-system planning and operations have increasingly emphasized redundancy, contingency planning, and system resilience. These developments do not eliminate the need for vegetation management, nor do they establish that an outage on the WT-11 corridor would be without significant consequences. They do, however, make current system redundancy and operational practices relevant to evaluating the consequences of tree-related events and the level of vegetation management necessary to maintain acceptable reliability.

The DEIR would therefore benefit from a more explicit analysis of how current transmission-system redundancy, contingency capabilities, and operational practices affect the reliability justification for the proposed expansion. Such analysis would help decision-makers evaluate the relationship between vegetation risk, actual system consequences, and the scale of permanent environmental alteration being proposed.

Why This Matters

A complete record of historical transmission reliability—including the frequency, location, duration, and customer consequences of tree-related outages—is essential to evaluating the necessity and proportionality of the proposed project. That analysis should also account for current transmission-system reliability requirements, redundancy, and operational practices.

Given the extent and permanence of the proposed environmental changes, the technical record should clearly establish **why expansion at the proposed scale is necessary; how the proposed corridor widths were determined; why less environmentally damaging approaches would be insufficient; and whether narrower, targeted, or site-specific measures could achieve the required reliability objectives, particularly in environmentally sensitive areas.**

PRINCIPAL QUESTION 2

Have Less Environmentally Damaging Alternatives Been Fully Evaluated?

A central purpose of environmental review under the Massachusetts Environmental Policy Act (MEPA) is to ensure that reasonable alternatives are carefully evaluated before projects with significant environmental impacts are approved. This principle is especially important when a

proposal would permanently alter forests, wetlands, wildlife habitat, vernal pools, public water-supply watersheds, and other sensitive natural resources.

The DEIR considers several broad alternatives, including underground transmission and reconstruction options. Applied across the entire 29.3-mile WT-11 corridor, these alternatives could involve substantial engineering challenges and significantly higher construction costs. However, the DEIR does not appear to fully evaluate whether such alternatives could be applied selectively in locations where environmental resources are particularly sensitive.

For example, the Buffam Brook conservation area could warrant consideration of a site-specific engineering alternative, such as modifying or raising existing transmission structures to reduce the extent of tree clearing. Even if such an approach would be impractical or prohibitively expensive throughout the entire corridor, its feasibility at particularly sensitive locations deserves consideration.

A more fundamental question is whether selective vegetation-management practices could achieve Eversource's reliability objectives while avoiding some of the permanent impacts associated with broad-scale corridor expansion. Such approaches could include selective tree removal, pruning, directional pruning, Integrated Vegetation Management (IVM), recurring inspections and maintenance, and other site-specific vegetation-management measures.

The DEIR dismisses targeted tree removal as "not a viable Project alternative because it would not achieve the Project's goal of reducing tree fall-ins." It further states that targeted removal "would likely compound the reliability problem by increasing the likelihood of tree fall-ins." Yet utilities operating transmission systems under climatic conditions comparable to those in western Massachusetts employ combinations of selective tree removal, pruning, directional pruning, Integrated Vegetation Management, recurring maintenance cycles, and site-specific approaches.

This does not establish that practices used by other utilities can simply be transferred to the WT-11 corridor. Each transmission system presents distinct engineering, environmental, and operational considerations. It does, however, raise an important question that the DEIR should address more fully: **Why would vegetation-management strategies successfully employed elsewhere in similar climatic conditions be insufficient to achieve Eversource's reliability objectives on all or portions of the WT-11 corridor?**

This question is particularly relevant because the proposed WT-11 approach differs substantially from the practices identified in our review of several other northeastern utilities. We have not identified a comparable utility proposing expansion of maintained transmission-corridor widths to approximately 252–576 feet through broad-scale straight cut forest clearing intended to substantially reduce major vegetation management for approximately 40 years.

Even if Eversource demonstrates that substantial corridor expansion is necessary in some locations, **it does not necessarily follow that the same approach is required throughout the entire 29.3-mile corridor.** A combination of vegetation-management practices and site-specific engineering solutions may offer opportunities to reduce permanent environmental impacts while maintaining acceptable levels of transmission reliability.

This consideration is particularly important in wetlands, areas surrounding vernal pools, Priority Habitat for Rare Species, public water-supply watersheds, conservation lands, and other environmentally sensitive areas. A more comprehensive evaluation of localized and site-specific alternatives would provide decision-makers with greater confidence that opportunities to avoid or minimize permanent environmental impacts have been fully explored.

Table 1. Comparison of Vegetation Management Approaches Used by Comparable Utilities

Table 1. Comparison of Vegetation Management Approaches Used by Comparable Utilities

Utility	Geographic / Climate Conditions	Primary Vegetation Management Approach	Routine Maintenance Cycle	Broad Straight Cut Corridor Expansion	Comments
Eversource (WT-11 Proposal)	New England. heavy snow, ice storms, hurricanes, nor'easters, mature forests	Expansion of maintained corridor through broad scale straight line 40-year forest cutting across a corridor of approximately 252–576 feet	Intended to substantially reduce or eliminate major vegetation management for 40 years	Yes	Proposed approach would permanently remove approximately 278 acres of forest and alter approximately 371 acres of land including 111.6 acres of Priority Habitat for Rare Species and 21 vernal pools.
National Grid	New England	Integrated Vegetation Management (IVM), selective tree removal, pruning, directional pruning	Recurring maintenance	No	Emphasizes targeted management while preserving stable vegetation communities whenever practical.
Central Maine Power	Maine	Selective removal of hazardous trees and recurring corridor maintenance	Approximately every 4 years	No	Maintains transmission reliability through regular inspections and recurring vegetation management rather than 40 year broad-scale straight line forest cutting.
Hydro-Québec	Québec	Section-by-section vegetation management using selective tree removal and recurring maintenance	Variable (approximately 3–13 years depending on corridor characteristics)	No	

Table 1 illustrates differences between the WT-11 proposal and vegetation-management practices identified in our review of other electric utilities. Although these utilities operate under different local conditions, their practices demonstrate that multiple approaches to transmission vegetation management are in use, including selective tree removal, pruning, directional pruning, Integrated Vegetation Management, recurring maintenance cycles, and section-by-section management.

This DEIR does not contain a cost analysis of alternatives which should extend beyond Eversource's projected vegetation management costs. A strategy that possibly reduces the need for recurring maintenance over approximately 40 years may provide financial and operation benefits to the utility. However, possibly reducing the utility's long-term maintenance expenditures must be evaluated and compared with the long-term costs of the project to the Commonwealth and affected communities.

This raises an important question of how costs are being measured.

Forests, wetlands, intact watersheds and other natural systems provide economical and environmentally valuable services over many decades. These include water filtration and groundwater recharge, erosion and flood control, carbon storage, improved air quality, climate resilience, protection of drinking water supplies, wildlife habitat as well as recreational and community benefits. Permanent forest conversion and alteration of wetland and watershed may diminish these services and may create significant environmental and financial costs that may be borne by municipalities, taxpayers, water suppliers and landowners.

Why This Matters

The alternatives analysis is a critical component of environmental review because it helps determine whether opportunities to avoid or reduce environmental impacts have been adequately considered. Given the scale and permanence of the proposed WT-11 clearing, a more comprehensive evaluation of selective vegetation management, recurring maintenance, site specific engineering measures, and combinations of these approaches is warranted before concluding that a very significant broad-scale straight line 40-year forest cutting corridor expansion represents the least environmentally damaging practicable means of achieving the project's stated reliability objectives.

PRINCIPAL QUESTION 3

Are the Anticipated Environmental Impacts Proportional to the Project's Need and Stated Objectives?

According to Eversource's DEIR, the WT-11 Transmission Right-of-Way Reliability Program would permanently remove approximately **278 acres of forest** and permanently alter approximately **371 acres of land** across eleven Massachusetts communities. The affected resources include wetlands, riverfront areas, 21 vernal pools, approximately **111.6 acres of Priority Habitat for Rare Species**, and portions of important public water-supply watersheds, including those associated with the Quabbin and Atkins Reservoirs.

The significance of these impacts extends beyond the number of acres affected. Forests, wetlands, streams, and associated habitats function as interconnected ecological systems that provide important public benefits, including stormwater management, groundwater recharge, erosion control, carbon storage, wildlife habitat, flood resilience, hiking and protection of drinking-water resources.

Unlike temporary construction impacts, many of the proposed changes would be permanent. The DEIR indicates that newly expanded portions of the transmission corridor would continue to be maintained in a condition that prevents the re-establishment of mature forest. The project would therefore not simply remove trees during construction; it would permanently alter the vegetation structure and ecological function of substantial portions of the landscape.

Priority Habitat and Wildlife

The DEIR identifies approximately **111.6 acres of Priority Habitat for Rare Species** within the proposed permanent clearing area, including permanent tree clearing within six habitat areas supporting species protected under the Massachusetts Endangered Species Act. These include the eastern box turtle, marbled salamander, wood turtle, and climbing fern.

While the presence of Priority Habitat does not necessarily preclude development, impacts of this scale reinforce the importance of carefully evaluating opportunities to avoid, minimize, or mitigate permanent habitat loss wherever practicable.

Wetlands and Vernal Pools

Construction would require access by substantial heavy equipment, including flatbed trucks, mowing equipment, skidders, forwarders, bucket trucks, mechanical tree-cutting equipment, woodchippers, and log and chip trucks. The DEIR indicates that construction mats would be placed on approximately **8 acres of bordering vegetated wetlands and 4 acres of other wetlands** to support equipment access.

The potential effects of construction access and matting on wetland soils, vegetation, hydrology, and habitat warrant careful evaluation, particularly where repeated or prolonged equipment use is anticipated.

The DEIR also identifies one certified vernal pool that would be permanently converted from a forested to a scrub-shrub community and acknowledges an additional 20 uncertified vernal pools within or adjacent to the project corridor.

The distinction between certified and uncertified vernal pools is administrative rather than an indication that uncertified pools necessarily have less ecological value. Certification requires documentation of specified physical and biological characteristics, and ecologically significant pools may remain uncertified.

Moreover, the ecological significance of vernal pools extends beyond the pools themselves. Wood frogs and spotted and marbled salamanders, for example, depend upon temporary, fish-free pools for breeding but spend substantial portions of their lives in surrounding upland forest. Evaluating impacts only within pool boundaries may therefore understate effects on the species and ecological communities that depend upon them.

Forest Fragmentation

Direct habitat removal is not the only potential consequence of corridor expansion. Widening an existing transmission corridor can increase forest fragmentation and edge habitat, potentially affecting temperature, humidity, sunlight, invasive-species dynamics, predator-prey relationships, and wildlife movement.

For forest-dependent species, these effects may extend beyond the acreage directly cleared. Fragmentation and expanded forest edges should therefore be considered as part of the project's overall environmental impact.

Drinking Water, Soils, and Watersheds

Portions of the proposed project corridor intersect watersheds contributing to important public drinking-water supplies. Shutesbury, Pelham, and Belchertown lie within the watershed of the Quabbin Reservoir, one of the Commonwealth's most important drinking-water resources.

The proposed corridor expansion crosses 101 mapped soil areas, including more than 40 soil types where erosion potential is described as severe. Removal of mature forest and changes in vegetation cover can increase the potential for erosion and sediment transport, particularly on vulnerable soils and slopes.

Forested watersheds contribute to groundwater recharge, erosion control, water filtration, and maintenance of water quality. Changes in vegetation cover within important watersheds therefore warrant careful technical evaluation of how construction, clearing, and long-term vegetation management may affect these functions.

The Atkins and Pelham Reservoirs provide approximately half of Amherst's drinking-water supply. Tributaries to the Atkins Reservoir, including Nurse Brook and Dean Brook, flow through areas proposed for substantial tree clearing. Potential effects of clearing, soil disturbance, erosion, and sedimentation within these watersheds merit particular attention.

Why This Matters

Some environmental impacts may be unavoidable when necessary infrastructure is constructed or maintained. The relevant question is whether impacts of the **magnitude, geographic extent, and permanence proposed for WT-11 are proportional to the demonstrated reliability need** and whether opportunities to avoid or substantially reduce those impacts have been adequately evaluated.

The reliability record discussed in Principal Question 1 and the alternatives discussed in Principal Question 2 are therefore directly relevant to this assessment. Together, they raise the question of whether permanent removal of approximately 278 acres of forest and alteration of approximately 371 acres of land are necessary to achieve the project's reliability objectives, particularly where sensitive natural resources could be affected.

PRINCIPAL QUESTION 4

Has the Public Review Process Fully Supported Informed Decision-Making?

Public participation is an important component of environmental review. Affected communities can contribute detailed knowledge of local wetlands, streams, wildlife habitat, drinking-water resources, conservation lands, recreational areas, and other site-specific conditions that may not be fully reflected in technical documents. Public dialogue also allows participants to understand the assumptions underlying a proposal and enables project proponents to respond to technical questions and identify potential alternatives.

Eversource has conducted public outreach as part of the WT-11 environmental review process. However, our experience at the June 4 public information session at the North Amherst Library raised concerns about whether participants had sufficient opportunity for substantive discussion of important technical and environmental questions.

Members of local Planning and Select Boards and other attendees raised questions concerning the need for the proposed corridor expansion and the potential use of less environmentally damaging vegetation-management practices. In one instance, Eversource's arborists were asked directly whether selective tree removal, pruning, or directional pruning could be used, at least in environmentally sensitive portions of the corridor, rather than broad-scale straight line cutting throughout the project area. The question referenced approaches used by other utilities, including National Grid, Central Maine Power, and Hydro-Québec. According to those present, the question did not receive a substantive response.

This matters because the feasibility of selective and site-specific vegetation management is central to the project's alternatives analysis. Public information sessions provide an important opportunity for Eversource to explain why such approaches would or would not satisfy its engineering and reliability requirements.

More broadly, participants at the June 4 meeting reported that a number of questions and concerns were not fully addressed through open group discussion. A more structured opportunity for technical dialogue—in which questions and responses can be heard by all participants—could improve transparency and provide a clearer record of the technical reasoning supporting the project.

For a proposal involving permanent environmental changes across eleven communities, questions concerning project necessity, alternatives, environmental impacts, and site-specific conditions should receive clear responses wherever possible, with unresolved technical questions identified for further analysis.

Why This Matters

Meaningful public engagement can strengthen environmental review by improving transparency, expanding the information available to decision-makers, and ensuring that local knowledge is considered alongside engineering and environmental analyses.

Given the scale and permanence of the WT-11 proposal, additional opportunities for structured public and technical discussion would help ensure that significant questions raised by affected communities are addressed before final decisions are made.

RECOMMENDATIONS

The following recommendations are intended to ensure that decisions involving substantial and permanent environmental change are supported by a complete, transparent, and technically sound record.

Recommendation 1: Strengthen the Demonstration of Project Necessity

Before final permits are issued, the environmental record should more clearly demonstrate why, given the historical reliability of the WT-11 transmission corridor under existing vegetation management practices, the proposed scale of corridor expansion is necessary to achieve Eversource's stated reliability objectives.

Eversource should provide the technical and engineering analyses supporting the proposed expansion of maintained corridor widths from approximately 125–335 feet to approximately 252–576 feet. This analysis should explain how historical system performance, tree-related outage history, current transmission-system reliability requirements, and projected future risks were incorporated into the proposed design.

A more complete technical demonstration of project necessity including present-day redundancy, contingency capabilities and operating practices would improve transparency and provide greater confidence that the proposed permanent alteration of approximately 371 acres of land is necessary and supported by a demonstrated reliability need and an appropriate engineering foundation.

The record should also explain why the proposed approach is necessary throughout the entire 29.3-mile corridor rather than in particular locations where documented risks and events warrant additional vegetation management.

Secretary Tepper's certificate states that two outages, one lasting 11 hours and 57 minutes and the second lasting 1 day, 3 hours and 52 minutes occurred on the 1.3-mile section of line 312/393. Eversource needs to supply a complete account of the customer impacts associated with these events. They also need to explain why the trees responsible for these events could not have

been identified and addressed through selective removal, pruning or other measure within a recurring vegetation-management program.

Recommendation 2: Expand the Evaluation of Reasonable Alternatives

The alternatives analysis should include a more comprehensive evaluation of less environmentally damaging vegetation-management and engineering approaches, including Integrated Vegetation Management (IVM), recurring maintenance cycles, selective tree removal, pruning, directional pruning, and site-specific engineering solutions where appropriate.

The analysis should explain why approaches employed by utilities operating under comparable climatic conditions—including National Grid, Central Maine Power, and Hydro-Québec—would not adequately achieve Eversource's reliability objectives on all or portions of the WT-11 corridor.

Rather than evaluating broad alternatives only on a corridor-wide basis, Eversource should assess whether combinations of vegetation-management practices and site-specific engineering measures could reduce permanent impacts in wetlands, vernal pools, Priority Habitat for Rare Species, public water-supply watersheds, conservation lands, and other sensitive areas.

Financial comparison between current and proposed maintenance costs

Eversource should be required to give a detailed and complete transparent financial comparison between the projected long-term maintenance costs of their proposed 40-year broad based straight-line forest cut, the costs of less environmentally damaging alternatives as well as the long terms costs of their current maintenance schedule.

A transparent comparison would allow regulators and the public to evaluate the full tradeoffs among reliability, maintenance costs, and environmental consequences.

A strategy that may reduce the need for the same level of recurring maintenance over approximately 40 years may provide financial and operation benefits to the utility. Less environmentally damaging approaches may require more frequent maintenance and therefore may possibly impose higher recurring costs on the utility. However, minimizing the utility's long-term maintenance expenditures is not necessarily the same as minimizing the long-term costs of the project to the Commonwealth and affected communities.

This raises an important question of how costs are being measured. A cost analysis of Eversource's proposed corridor expansion should extend beyond their projected vegetation management costs.

Forests, wetlands, intact watersheds and other natural systems provide economical and environmentally valuable services over many decades. These include water filtration and

groundwater recharge, erosion and flood control, carbon storage, improved air quality, climate resilience, protection of drinking water supplies, wildlife habitat as well as recreational and community benefits. Permanent forest conversion and alteration of wetland and watershed may diminish these services and may create significant environmental and financial costs that may be borne by municipalities, taxpayers, water suppliers and landowners.

Recommendation 3: Obtain an Independent, Interdisciplinary Technical Review

The principal questions surrounding the WT-11 Transmission Right-of-Way Reliability Program are technical and interdisciplinary. They concern the engineering basis for the proposed corridor expansion, alternative vegetation-management strategies, the environmental consequences of permanent forest conversion, and the relationship between those impacts and the project's stated reliability objectives.

Given the scale and permanence of the proposed changes across eleven Massachusetts communities, an independent interdisciplinary technical review should be conducted before final project decisions are made.

Relevant areas of expertise could include **transmission engineering, utility forestry, ecology, hydrology, conservation biology, watershed science, and environmental planning.**

Such a review could independently assess the engineering assumptions underlying the proposed corridor widths; evaluate whether alternative vegetation-management and site-specific engineering approaches could achieve comparable reliability objectives; examine potential impacts on forests, wetlands, wildlife habitat, and water resources; and identify opportunities to avoid or reduce permanent environmental impacts.

Independent technical review should not be viewed as an obstacle to necessary infrastructure improvements. It would strengthen the record available to regulators and the public and provide greater confidence that project necessity, reasonable alternatives, and environmental consequences have been evaluated objectively and comprehensively.

Recommendation 4: Provide Additional Opportunities for Meaningful Public Engagement

Eversource should provide additional opportunities for structured public technical presentations and question-and-answer sessions in which appropriate transmission engineering, utility forestry, and environmental specialists are available to respond directly to substantive questions.

Such sessions would allow municipal officials and residents to contribute local ecological knowledge while giving Eversource an opportunity to explain the technical basis for its proposed approach and respond to questions concerning project necessity, alternatives, and environmental impacts.

Meaningful public participation benefits applicants, regulators, municipalities, and residents by improving both the quality and transparency of environmental decision-making.

CONCLUSION

The WT-11 Transmission Right-of-Way Reliability Program presents an important opportunity to demonstrate that reliable electric transmission and environmental stewardship can be advanced together.

Massachusetts depends upon a resilient electric grid to support homes, businesses, hospitals, emergency services, and economic activity. At the same time, the forests, wetlands, streams, wildlife habitat, vernal pools, and drinking-water resources affected by this proposal provide enduring ecological, economic, and public benefits to the Commonwealth. **These responsibilities are complementary rather than competing.**

Eversource has identified a legitimate reliability objective: reducing the risk that trees could contact transmission lines. The question is whether their DEIR has demonstrated that the proposed response is necessary at the scale proposed.

The present record raises significant questions. Information presented during the public review process indicates that Line 354, comprising approximately 28 miles of the 29.3-mile project corridor, has experienced no tree-caused outages, while two tree-related outages have been identified within the remaining approximately 1.3-mile portion involving Line 312/393. The information made available does not provide a complete account of the customer consequences of those events or fully explain how this historical record supports expansion throughout the corridor.

At the same time, the environmental consequences are substantial and long-lasting: approximately **278 acres of forest would be permanently removed and approximately 371 acres of land permanently altered**, affecting wetlands, vernal pools, 111.6 acres of Priority Habitat for Rare Species, drinking-water watersheds, and other natural resources.

The alternatives analysis also leaves important questions unresolved. Other utilities operating under challenging climatic conditions employ combinations of selective tree removal, pruning, directional pruning, Integrated Vegetation Management, recurring maintenance cycles, and site-specific approaches. These comparisons do not establish that another utility's practices can simply be transferred to WT-11. They do, however, reinforce the need for a clear technical explanation of why such approaches, individually or in combination, would be insufficient along all or portions of this corridor.

Financial considerations should be part of that evaluation. If Eversource's proposed approach would substantially reduce recurring vegetation-management costs over approximately 40 years, those savings should be clearly documented and compared with the costs of less environmentally damaging alternatives as well as the cost of their current maintenance schedule.

This critical analysis should also consider the long-term environmental and public costs associated with permanently altering hundreds of acres of natural resources. **Possible short-term**

or long-term savings to the utility should not, by themselves, determine what constitutes the best long-term outcome for the Commonwealth.

This review therefore recommends four steps before final decisions are made: **a stronger technical demonstration of project necessity; a more comprehensive evaluation of reasonable alternatives, including transparent long-term cost comparisons; an independent interdisciplinary technical review; and additional opportunities for meaningful public engagement.**

The central question is not whether reliable electric transmission is important or whether responsible vegetation management is necessary. Both are essential. The question is whether their DEIR has demonstrated that corridor expansion **at the scale proposed** is necessary and represents the **least environmentally damaging practicable means** of achieving Eversource's stated reliability objectives.

Given the extent and permanence of the proposed environmental changes, that determination should rest on the strongest technical evidence reasonably available. Where opportunities exist to achieve necessary reliability objectives while preserving forests, wetlands, wildlife habitat, vernal pools, drinking-water resources, and other sensitive natural systems, those opportunities deserve rigorous consideration.

Massachusetts should not have to choose unnecessarily between a reliable electric grid and responsible stewardship of its natural resources. The challenge—and the responsibility—is to achieve both.

Jeff Weston

Member, Shutesbury Planning Board

Eversource's proposed WT-11 Transmission Right-of-Way Reliability Program (TRRP) Project - submitted public comments from Michael DeChiara of Shutesbury

From: [Michael DeChiara](#)
To: [Maureen Pollock](#)
Subject: Heads Up about Eversource Transmission Line project
Date: Wednesday, September 23, 2026 12:46:36 PM
Attachments: [Open Letter to Governor Healey \(1\).pdf](#)
[WT 11 letter -Ongoing Concerns- 7-7-26.pdf](#)

Dear Maureen and ConComm members,

I am writing as a representative of a resident-led group, [Western Mass Towns for a Responsible Grid](#). We have been working to ensure that the proposed Eversource transmission line project, WT-11, that will be running through 11 towns, including Montague, minimizes clearcutting and other negative environmental impacts.

To date, we have been primarily engaging residents but we wanted to make sure that town officials are also aware since the Final Environmental Impact Report will likely be submitted to the state in December 2026. Proactive local engagement on this matter will make the difference between a good project and a damaging one.

The following are resources to review and share:

- An open letter to the Governor about our concerns sent on Sept 21. (attached)
- A letter to EEA Secretary Tepper about our concerns sent on July 7 (attached)
- A [petition](#) signed by almost 250 residents

For more information, please visit our website at [NoClearcutForProfit.org](#) (or <https://sites.google.com/view/responsiblegrid/eversource>)

We can be reached at ResponsibleGrid@gmail.com

Thanks. We hope this is helpful.

Michael DeChiara
Shutesbury

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Michael DeChiara
Pronounced "day-key-ara"
mdechiara@gmail.com

Preferred pronoun: he/him/his ([why include this?](#) -- [about pronouns](#))

Dear Governor Healey:

Western Mass Towns for a Responsible Grid urges you to prevent Eversource from unnecessarily clearcutting 278 acres in 11 towns. Their WT-11 project is the first of an extensive series of clearcuts they plan in Western MA, with another ~2000 acres facing the chainsaw next. State-designated categories of sensitive lands are included, as are places that generations of residents have cherished, with the surrounds of Buffam Falls Conservation Area as a case in point. People across the region would be furious and heartbroken to see your administration permit Eversource's greed to ruin these places.

Of course we want Eversource to be a responsible steward of a reliable power grid, and of course that involves some cutting. However, Eversource's actual goal for this project is not to improve reliability – which it wouldn't, for the reasons below – but to boost Eversource's own profits while doing nothing for affordability.

Eversource claims their intent is to improve reliability, but that's a lie. Outages are almost never associated with large transmission lines. Unlike distribution lines, large transmission lines already have wide corridors, federally-mandated annual management, and redundant design for resilience.

- Not a single tree has caused an outage, ever, on the line that makes up 28 of this project's 29.3 miles. Two have on the other, 1.3-miles of line, but it's unclear if those trees should have been addressed by Eversource's mandated annual management, and also whether the outages had any impact on customers or equipment, or were handled by redundancy.
- Large transmission lines have proven themselves decisively in real-world conditions. Even in the historic storm of October, 2011, across the entire Northeast, not a single large transmission line outage was caused by a tree outside the corridor width that Eversource already has cleared.

Eversource proposes to clearcut trees that couldn't reach the lines. Their indiscriminate, straight-line swaths would approximately double their already-effective 125'-335' corridor width. Thousands and thousands of the trees they'd cut are not hazards now – if they were, they'd have been addressed during annual management. Many of them will never become hazards, either. Even a cursory review of Eversource's justification reveals biased assumptions and double-speak. For just one example, they propose to cut, now, every tree that might threaten the lines in the next 40 years. And, instead of a defensible way to project those 40 years of growth, they base their proposed cut zone on a fantasy that every tree will break current height records. With their proposal riddled by similarly faulty reasoning, we need government to demand objectivity and evidence.

So why is Eversource really pursuing this aggressive clearcut? Cutting 40 years of hypothetical growth in one fell swoop would **cut Eversource's cost** of annual maintenance. Nowhere in the hundreds of pages of their proposal does Eversource broach the topic of their obvious savings, let alone any thought of passing them along to improve affordability. In fact, Eversource has been known

to use the cost of projects like this to justify raising rates. Notably, Eversource raised rates even when their profits doubled in 2024-2025.

Tell Eversource: **No Clearcut for Profit**. Don't let them force a one-size-fits-all approach across an entire, multistate service area. WT-11 alone includes tiers of region-defining and state-designated environments (e.g., 86 acres of Priority Habitat of Rare Species; 47 acres of wetlands and riverfront; and 21 vernal pools). Verbally, Eversource claims they'll encourage their subcontractors to be discerning in the most sensitive areas, but Eversource must be told:

1. **Put it in writing**. If they really do mean to be selective anywhere, that should be on their maps, and their precise intent should be detailed in their project narrative.
2. Stick to **selective cutting and pruning of soon-to-be hazardous trees** wherever a substantial number of trees can be saved, at the very least in the environmentally sensitive areas of the project. This directive should apply in both the entire zone proposed for corridor-widening, and in the exceptional portions of the wire zone that Eversource has selectively maintained up until now.

The EEA issued their certificate for Eversource's WT-11 Draft Environmental Impact Report, and despite hundreds of residents' public comments before then and our attempted communication with that office since, without a bold statement from state leadership, we expect that Eversource will be allowed to proceed. In the absence of unbiased evidence that the project is necessary, and that its approach minimizes destruction, it must be stopped. Please step in to ensure that trees that don't threaten the lines will be left to beautifully provide their irreplaceable benefits to habitats, the climate, our watershed, the air, and the residents of Western Mass.

Sincerely,

Western Mass Towns for a Responsible Grid

More details at: NoClearcutForProfit.org

Executive Office of Energy & Environmental Affairs
100 Cambridge St. 10th Floor
Boston, MA 02114

July 5, 2026

Dear Secretary Tepper:

We're aware that WT-11 isn't in a public comment period for its Environmental Impact Report, but many of us are alarmed with how the plan is progressing, and after several community meetings and the last round of comments, we're not feeling heard. We've been in contact with our legislators, and we feel compelled to communicate our concerns to you.

The minimum prerequisite for a reliability improvement project should be that it improves reliability. As we'll explain, Eversource has not demonstrated that 1) there's a substantial reliability risk to reduce, nor 2) that their plan would reduce it. Despite this project being well along the regulatory path, we emphatically ask you to evaluate it in terms of these fundamental criteria. We believe it does not pass the lowest bar. Those in our community who have reviewed project documents, attended information sessions, and conducted independent research note the following about each of these two prerequisites:

1) The risk is NOT substantial: Eversource tries to portray an existing and evolving substantial risk, but that portrayal is misleading.

- First, Eversource tried to create the impression of a history of outages. When pressed, they admitted there have been zero outages on the line that makes up 28 of the project's 29.3 miles.
- Your certificate mentions their claim of two outages on the remaining line, but when pressed in a community meeting, they back-peddled further. It turns out, they're not distinguishing between outages that result in significant damage or customer impact and transient faults that the grid and its transmission lines are engineered to handle, with redundancy and resilience.
- Even in the historic October 2011 storm, only one tree-caused outage impacted *any* 345KV line (i.e., the ones that already have wide corridors). That one outage was caused "when a sixty-five-foot tall tree located within a full right-of-way (forty-six feet from the nearest transmission line) fell," per the DEIR (p.343). This was a true "danger tree" that utilities are mandated to manage on an annual basis. They apparently failed to do so, but that doesn't mean that they should clear-cut a wider corridor instead.

Eversource says that climate change is increasing risk, but their analysis doesn't show that the past *or* that predicted future justifies a wholesale conversion from their current, selective management approach across their right-of-way to much more extensive clear-cutting.

2) The plan is NOT targeted to reduce risk: Eversource contorts their alternatives analysis to try to make the case for their preferred plan.

- Eversource is federally mandated to adhere to an annual work plan for "danger trees," and in a recent community meeting, they confirmed that they are in compliance with this requirement. However, they egregiously omit this status quo in their alternatives analysis, substituting "No Action" instead, to artificially improve their preferred plan by comparison. The status quo of annual management should be part of the "robust alternatives analysis" that we were glad to see you note is "a fundamental aspect of MEPA reviews."
- Since Eversource already identifies and manages the danger trees that could come within a few feet of the lines if they fell, the thousands and thousands of additional trees that Eversource's proposed plan

would clear-cut are *not* danger trees. They could *not* threaten the lines if they fell. Cutting them does *not* increase reliability.

- Eversource tries to redefine danger trees as every tree that might, if it broke records over the next 40 years, reach the wires, plus all the other nearby trees with mature heights of >30'. You should reject that reframing as wildly excessive and blatantly self-serving.
- Eversource tries to redefine selective management as eliminating six acres of their formerly-proposed project. As they well know, that's not the industry-established, federally-defined meaning of the term. Selective management is, in fact, what they practice now, across their ROW, and they do so very effectively. We advocate for this continued practice.

Without these distortions, Eversource's analysis doesn't demonstrate that their plan would improve reliability.

Require an environmentally responsible approach, not a profit-maximizing one. Further corridor-clearing....:

...violates the *avoid, minimize, mitigate* hierarchy: We're heartened that your certificate calls for Eversource to "demonstrate that the project will take all feasible measures to avoid, minimize and mitigate impacts to the maximum extent practicable," consistent with the principles of the 2024 Clean Energy Law. However, we're not convinced that the 75' alternative you encourage Eversource to pursue does so. Eversource has not demonstrated with data why the corridor they already have, plus the selective management they already practice, is insufficient to deliver reliability.

- This proposal is characteristic of Eversource's extreme aggressiveness in vegetation management. Among the peer utilities we reviewed, WT-11 stands out in that it both converts substantial forested land to permanently maintained corridor, and applies aggressive, mature-height-based removal across that newly widened area.
- Whatever the right corridor width is, there's enough outage data that it should not be arbitrary or based on a misleading and self-serving analysis. Claims that further clearing would improve reliability must be evidence-based.

... increases profits, and *not* affordability: This so-called reliability improvement project could more accurately be called a profit improvement project. Cutting everything all at once would reduce Eversource's annual management costs.

- While energy affordability is a priority goal for the administration, there should be no illusion that increased profits would lead to lower rates for customers. In fact, Eversource substantially increased customers' bills even while their net profits doubled between 2024 and 2025. Eversource expresses no intent to pass along any of their savings from this project.
- Given the EEA's commitment to promoting ecosystem services and climate resilience, allowing a utility to clear-cut forests to maximize their own profit would be bad policy.

Many valid points were raised in the EENF certificate approved by the previous administration and in the two rounds of public comments. Eversource has chosen to disregard them, or to respond to them inadequately. Their proposed project deserves greater and continued scrutiny.

Sincerely,

Stacey McCullough, Pelham Planning Board

Michael DeChiara, Chair, Shutesbury Energy and Climate Action Committee; Planning Board

Judith S. Eiseman, Land Use and Environmental Planning Consultant

Sharon Weizenbaum
Lenore Bryck, Climate Action Now WMass
Jeff Weston, Shutesbury Planning Board

Cc: Melissa Hoffer, Climate Chief
Senator Comerford
Senator Oliveira
Rep. Domb
Rep. Saunders

- New consolidated local permitting process for small clean energy projects under 225 CMR 29.0 - Presentation Slides



MASSACHUSETTS
**DEPARTMENT OF
ENERGY RESOURCES**

New Local Permitting for Clean Energy Projects – What You Need to Know

MAPC MWRC and SWAP
Presentation

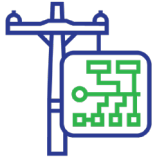
July 9, 2026

Presented by

Stephen Meno, AICP, Central Regional Coordinator, Clean Energy Siting and Permitting,
DOER
Marcela Castillo, Northeast Regional Coordinator, Clean Energy Siting and Permitting,
DOER



Why the Focus on Clean Energy?



MORE ABUNDANT ELECTRICITY

Demand is rising. Solar and storage facilities are relatively fast to build and provide cost-effective energy.



BENEFITS TO RESIDENTS AND COMMUNITIES

Reducing emissions will prevent 400 deaths, 25,000 days of missed work annually. Adding clean energy creates new jobs and economic development opportunities across Mass.



A MORE RESILIENT, RELIABLE, AFFORDABLE GRID

Increases our energy independence; reduces the need for dirty, expensive peaker plants; reduces long-term infrastructure costs



IT'S THE LAW

2008 Global Warming Solutions Act, 2018 Clean Energy Act, and 2024 Climate Act establish/restate requirement to reduce emissions to 80% of 1990 levels by 2050

Removing Obstacles

Biggest hinderances to investments in clean energy infrastructure,
per commission



INTERCONNECTION DELAYS

- Projects can wait years after receiving permits.
- Utilities are working on Capital Investment Plans (CIPs), in partnership with Grid Modernization Advisory Council.



GROWING COSTS

- Cost of materials and labor continues to put squeeze on project economics.



LOCAL & STATE PERMITTING

- 351 apps and processes
- Lengthy review timelines
- Multiple appeal routes
- Incomplete applications
- Impacts on local enviro
- Lack of public engagement
- Lack of review standards

Solution - 2024 Climate Law

- Biggest local permitting reform in a generation
- New **optional** consolidated permitting pathway
- Hard deadlines for decision making
- One appeal pathway
- New process for evaluating site suitability, and needed minimization and mitigation



2024 Climate Law

Two classifications of clean energy infrastructure projects

	Small	Large
Permitting Authority	Municipality	Energy Facility Siting Board
Generation	<25 MW	≥25 MW generation
Storage	<100 MWh	≥100 MWh
Transmission and Distribution	<1-mile long new corridor <10-mile long existing corridor	All other types (developers can also request EFSB to review Small Transmission and Distribution Projects)

20 kW Ground-mounted Solar

Type	Ground-mounted solar
Size	Up to 20 kW
Use	Primary
Site	Municipal
Dimensions	Approximately 1,400 sq. ft.
Typical Use	This size system can support the energy demands of a library or a small strip mall.
225 CMR 29.07 and 29.08	Exempted from requirements



Image of an approximately 20 kW ground-mounted solar system next a small home. Photo credit: ASG

1 MW Ground-mounted Solar

Type	Ground-mounted Solar
Size	Up to 1 MW
Use	Primary
Site	Commercial
Acreage	Approximately 2.5 acres
Typical Use	A system of this size can generate enough energy to power roughly 200 homes.
225 CMR 29.07 and 29.08	Must meet requirements



*Image of 1 MW ground-mounted solar system in Pittsfield, MA.
Photo credit: Google Earth*

20 MW Commercial Ground-mounted Solar System

Type	Ground-mounted solar
Size	Up to 20 MW
Use	Primary
Site	Commercial
Acreage	Approximately 50 acres
Typical Use	A system of this size generates significant amounts of electricity for the grid, providing energy for thousands of homes.
225 CMR 29.07 and 29.08	Must meet requirements



Image of an expansive 20 MW commercial ground-mounted solar in Franklin County, PA. Photo credit: Google Earth

1 MWh Commercial Battery Storage System

Type	Battery Storage
Size	Up to 1 MWh
Use	Primary
Site	Commercial
Acreage	Approximately 0.1 acres
Typical Use	These facilities can store large amounts of energy to be dispersed during peak events, or serve as a type of generator during extreme weather events.
225 CMR 29.07 and 29.08	Must meet requirements



Image of a 1 MW battery storage system at the Dennis-Yarmouth Regional High School in Yarmouth, MA. Photo credit: Department of Energy Resources and CVEC

40 MWh Commercial Battery Storage Facility

Type	Battery Storage
Size	Up to 40MWh
Use	Primary
Site	Commercial
Acreage	Approx. 0.75 acres
Installation cost per MWh	Between \$350,000-\$600,000 per MWh
Typical Use	These facilities cheaply store large amounts of energy to be dispersed to thousands of customers, during peak events.
225 CMR 29.07 and 29.08	Must meet requirements

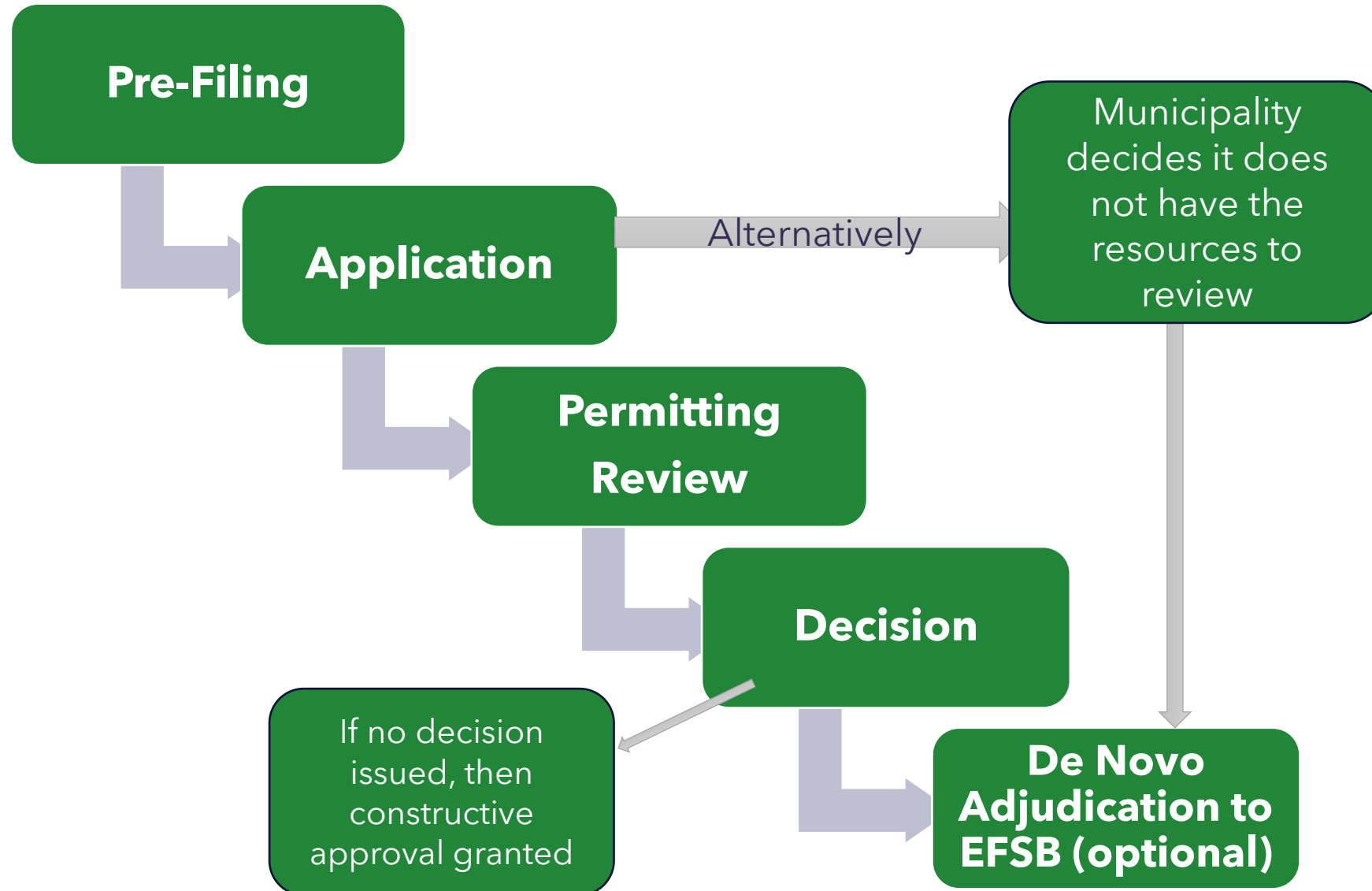


Image of a 38 MWh commercial battery storage system based in Provincetown, MA. The facility stands on a paved lot and is surrounded by forested land. Photo credit: Eversource

How does this compare to 40B?

	G.L. c. 40B §21 Comprehensive Permit	225 CMR 29.00 Consolidated Local Permit
Use	Affordable Housing	Clean Energy
Permitting Authority	Zoning Board of Appeals	Local Boards retain individual permitting authority
Municipal Exemptions	If municipality has at least 10% of its year-round housing stock classified as affordable	No threshold for exemption
Local Bylaws	Allowed to override local zoning bylaws	No impact to local authority
Appeals Pathway	Housing Appeals Committee	EFSB De Novo Adjudication

The Consolidated Permitting Process



Pre-Filing

GOAL: By having developers give a good-faith effort up front, we'll save time and energy elsewhere in the process

1 MEET LOCAL OFFICIALS

- Help identify key local stakeholders
- Check plan accuracy
- Confirm all needed permits

2 PUBLIC OUTREACH

- Host a public meeting
- Talk with stakeholders
- Project info on website

3 CERTIFY STEPS

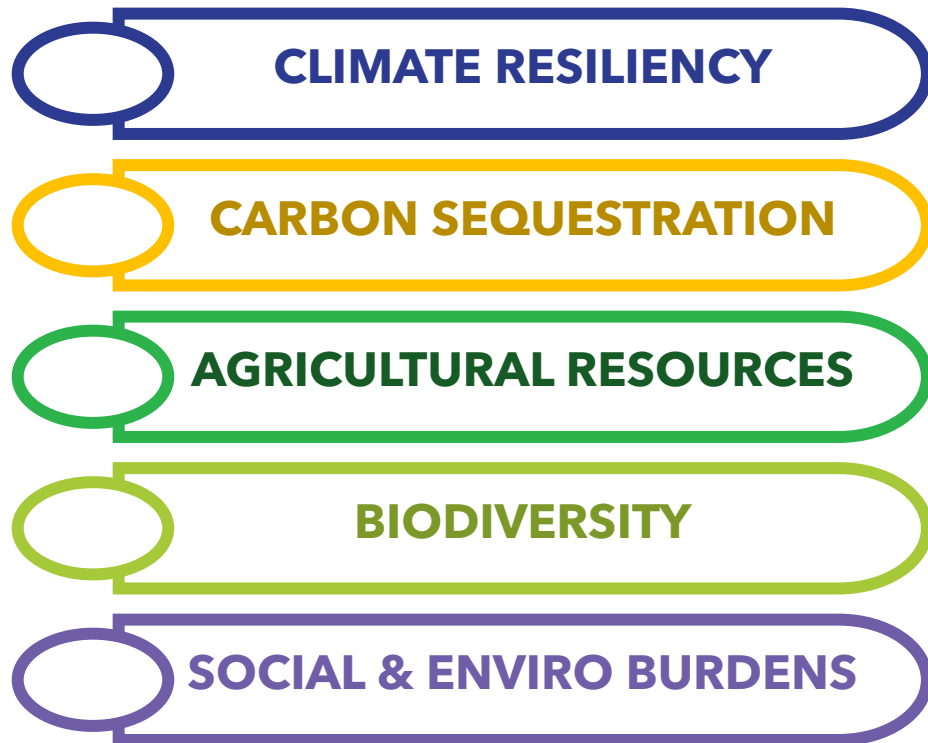
- Take feedback into consideration
- Outline steps taken



Site Suitability

GOAL: Make better siting decisions and limit environmental impacts through new site evaluation process

Scoring Criteria



- **Scored 0-5 (except climate resiliency 0-3)**

- Lower the score, less impact
- 0-1; little to no minimization/mitigation required
- 4-5; lots of minimization/mitigation required

- **Protected Open Space automatically scored 5 for some criteria**

- Predeveloped lands scored 0 for some criteria
- Article 97 process still applies

- **Based on EEA Guidance**

Exemptions from Site Suitability and Pre-filing

Exempted Generation

- Generation with a site footprint ≤ 1 acre
- Front-of-meter Solar $\leq 25\text{kW AC}$
- Solar Canopies
- Behind-the-meter, accessory-use Generation
- Generation eligible for the ITC

Exempted Storage

- Front-of-meter Storage $\leq 250\text{kWh AC}$
- Behind-the-meter, accessory use Storage

Other Exemptions

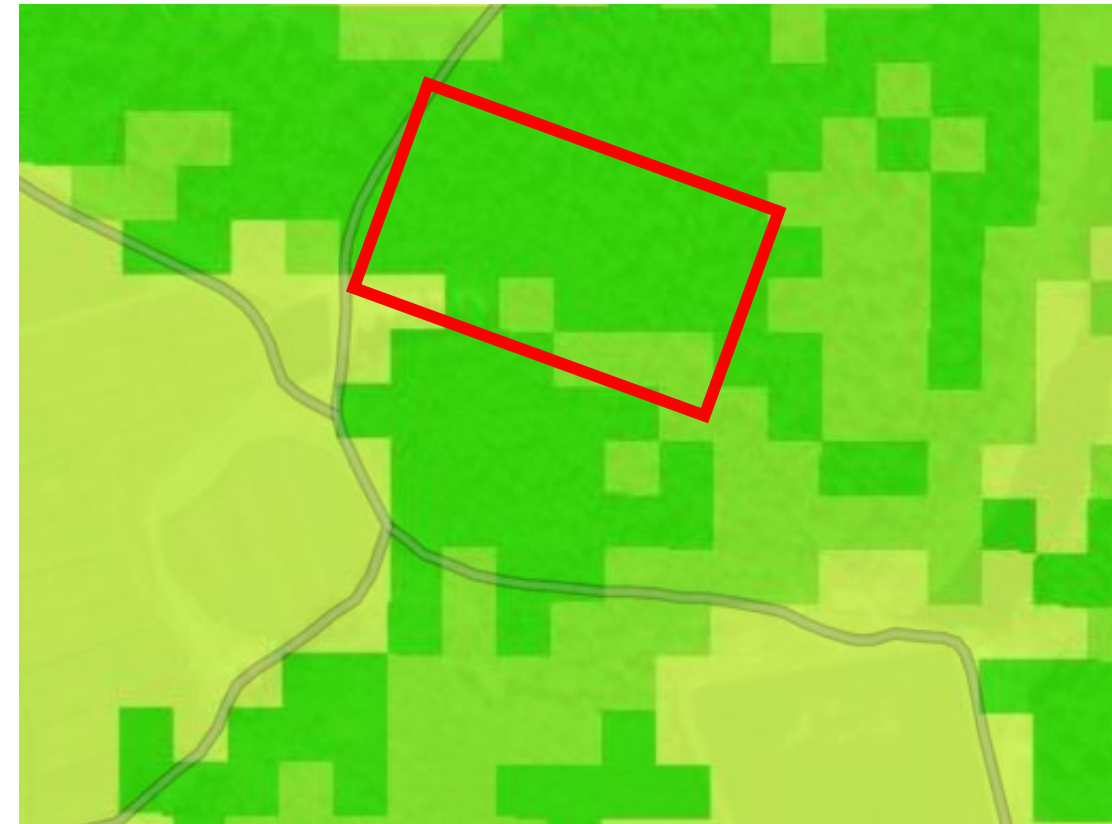
- Small Transmission & Distribution in existing right of way



Site Suitability Scoring Tool

Wooded Area for Battery Energy Storage in Central Mass.

CRITERIA	SCORE	REASON
CLIMATE RESILIENCY	2	Moderate Exposure to Riverine Flooding
CARBON SEQUESTRATION	1.5	Aging, lower productivity pine stands
BIODIVERSITY	4.5	Entire site is BioMap Core Habitat
AGRICULTURAL RESOURCES	0	Not farmland and no mapped soil resources
SOCIAL & ENVIRO BURDENS	3	MassEnviroScreen Score of 56.38



Snapshot from the *Proposed Site Suitability Assessment Criteria for Clean Energy Infrastructure* webmap with the Ecosystem Carbon Index (ECI) layer selected

Permitting Review – Site Suitability

GOAL: Local officials will be empowered to determine what level of minimization and mitigation is needed to offset impacts

The Local Government Representative will...

REVIEW

- Review Applicant-provided Site Suitability Report

ASSESS

- Assess adequacy of proposed M/M measures
- Consider if additional M/M steps are need

INCLUDE

- Consult with the Applicant
- Include any conditions in decision



Consolidated Local Permit Application

GOAL: Consistent, accurate, thorough project applications will enable a smoother, faster permitting process

Universal application covering all needed permits

- DOER/EFSB creating online permitting portal

Expectation for Developers:

- Fill it out thoroughly and accurately
- "Ready for review tomorrow"
- Provide Suitability Scoring Report, and proposed minimization and mitigation measures

Expectation for Local Government:

- Review for completeness within 30 days
- If not ready, document deficiencies and send back
- 30 days to fix or it can be denied
- May request review by way of De Novo Adjudication if Local Government lacks the resources to review



Permitting Review

GOAL: Create an optional permitting pathway that expedites decisions while preserving local authority

0

No action needed by local governments to implement.

1 decision

All boards and depts need to conduct their reviews and make decisions. But the Applicant receives just one decision.

12 months

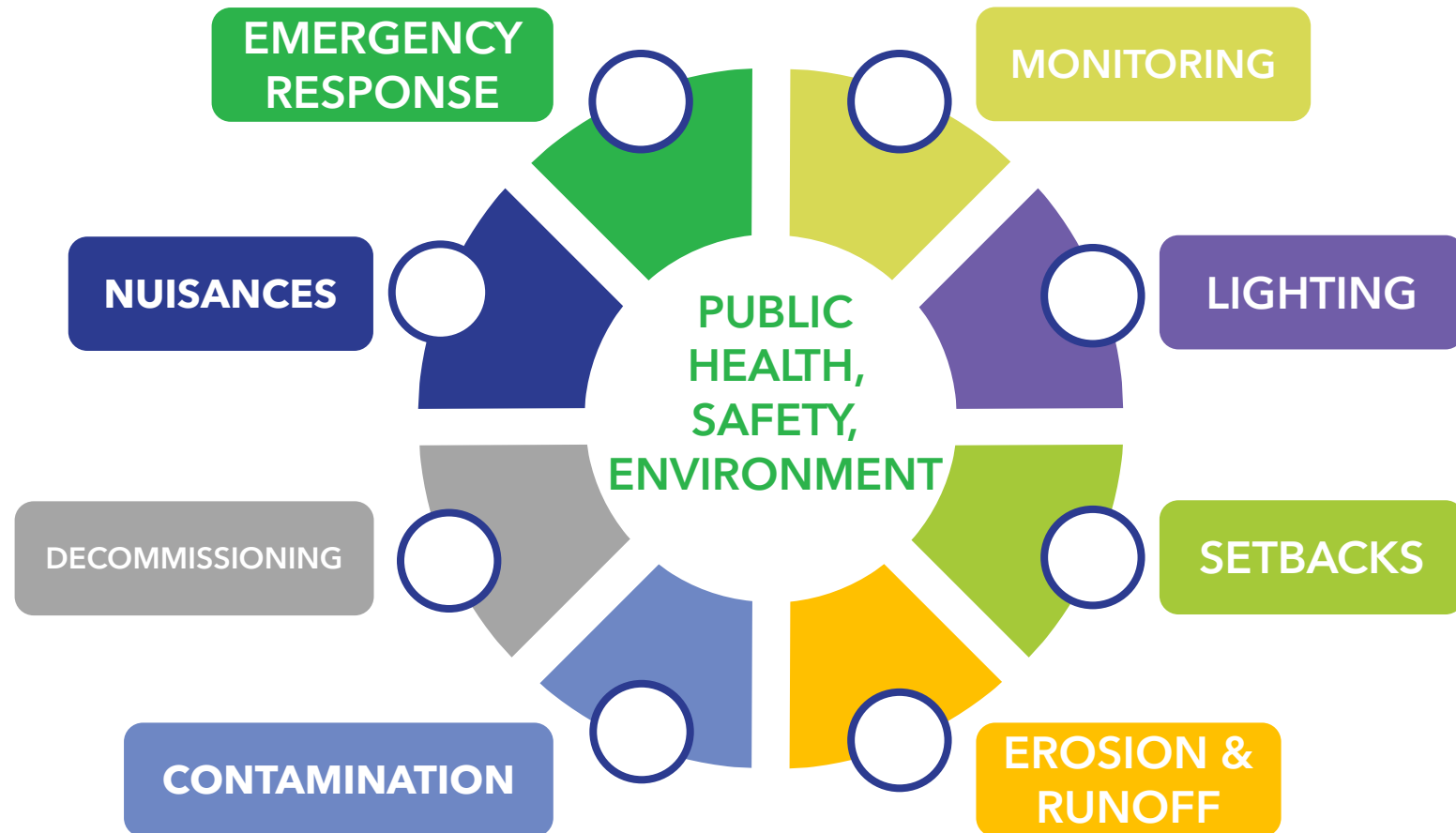
Decision needs to be issued within 12 months of determining app is complete. Ministerial permits not included.



Permitting Review – Standards

GOAL: Create clear upfront expectations for project designs

- Establishes standards for facility construction, operation, maintenance, and decommissioning
- Specifically states Applicants need to abide by Wetlands Protection Act, other DEP rules
- Munis are not prohibited from adopting additional standards (EFSB retains right to issue zoning exemptions under 40A)



Common Conditions in case of Constructive Approval

- Constructive Approval will occur when a municipality does not issue a decision within the 12-month timeframe
- Common Conditions were developed by DOER staff in coordination with the Energy Facilities Siting Board, and include conditions and requirements for the following topics:

Administrative and legal conditions

Conditions and requirements for construction

- (visual impact, vegetation, earthwork, etc.)

Conditions and requirements for operation and maintenance

- (stormwater control, emergency response, hazmat storage, etc.)

Decommissioning

Projects will still be enforced by the Local Government

Local Government Representative

"The Chief Administrative Officer of the Local Government, or their designee(s)."

- The major responsibilities for the Local Government Representative are:

1. Certifying that pre-filing activities have been completed

2. Determining Application completeness for a Consolidated Local Permit

3. Issuing the Decision or Constructive Approval for a Consolidated Local Permit

4. Assigning Minimization and Mitigation Measures for Site Suitability

- Potential Designee(s):
 - Municipal Planner
 - Building Commissioner
 - Building Inspector
 - Planning Board Chair
 - Conservation Commission Chair
 - Zoning Board Chair
 - Conservation Agent

What Do Municipalities Need to Do

Review Materials

- Final regulations and some guidelines have been published
- Additional guidelines will be posted soon
- Technical Assistance resources

Decide when to start offering new permitting pathway (July 1 - Sept 30 or Oct 1)

- Consult with municipal counsel on what process is to start offering new pathway
- Municipalities do not need to make bylaw/ordinance changes

Decide who should be the Local Government Representative

- Requires a decision by the Chief Administrative Officer (Mayor, City Manager, Town Manager, Town Administrator, Select Board, etc.)

Materials Coming from DOER

GOAL: DOER wants to hear from those who will implement the new rules

Regulations

- Final regulations were published on March 1, 2026
- Municipalities may start offering new pathway July 1 – Sept. 30, 2026
- Municipalities must start offering new pathway by Oct. 1, 2026

Guidelines

- Final Pre-filing, Standards and Common Conditions Guidelines have been published
- Finalizing Minimization and Mitigation, as well as Application

Model Bylaws

- Will be published on website

Technical Assistance

- FAQs, LGR, Lookbook, sessions hosted by RPAs
- Schedule a 1-on-1 meeting with your DOER Regional Coordinator



Online Training Materials

MassCEC, in collaboration with NFPA, offers a BESS and Solar Safety training course

Name of training course: Energy Storage and Solar Safety for Emergency Responders Online Training

Use code: MASSCEC2 for free access



Our Team

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MASSACHUSETTS
**DEPARTMENT OF
ENERGY RESOURCES**

Thank You!



- New consolidated local permitting process for small clean energy projects under 225 CMR 29.0
- Frequently Asked Questions

225 CMR 29.00

Frequently Asked Questions for What Municipalities Need To Do

Small Clean Energy Infrastructure Sitting and Permitting

May 26, 2026

What is different about the consolidated local permitting process for Small Clean Energy Infrastructure Facilities?

Under the consolidated local permitting process, cities and towns have 12 months to review and issue a decision on an application that is compiled of all the necessary materials for all non-ministerial permits sought by an Applicant. Applications that do not receive a decision within 12 months will receive Constructive Approval. Conversely, Applicants seeking a permit under a non-consolidated process must coordinate multiple applications, submissions, and review timelines.

To apply for a Consolidated Local Permit, Applicants will use a common Consolidated Local Permit Application ("Application") made available by DOER, instead of separate applications for each Local Government board and department. Once all Individual Application Components have been reviewed and decided on by local permitting authorities, the Local Government Representative will issue a Consolidated Local Permit representing the approval or denial of the Application as a whole.

Unique to the consolidated local permitting process is that Individual



Application Components may not be independently appealed before all boards have completed their review and the Local Government Representative issues its decision on the Application. Only the approval, denial, or Constructive Approval of an Application may receive a second look in the form of De Novo Adjudication in front of the Director of the Energy Facilities Siting Board pursuant to 980 CMR 14.00.

What is a Local Government for the purposes of Siting and Permitting a SCEIF?

For the purposes of 225 CMR 29.00, a “Local Government” includes all incorporated cities and towns in the Commonwealth, as well as regional agencies including, but not limited to, the Cape Cod Commission and the Martha’s Vineyard Commission.

What does a Local Government need to do if it wants to offer the consolidated local permitting process between July 1, 2026 and September 30, 2026 (also known as the concurrency period)?

If a Local Government elects to offer the consolidated local permitting process as a permitting option during the concurrency period, it should publicize its availability. Local Governments offering the consolidated local permitting process during the concurrency period must make it available to all parties seeking permitting for a SCEIF.



What should a Local Government do ahead of implementing the consolidated permitting process in their jurisdiction?

The Local Government should familiarize itself with the technical assistance materials prepared by DOER, including the universal Consolidated Local Permit Application, various checklists, and other resources. In addition, Local Government Representative(s) should plan to attend technical training sessions planned for this spring. Information about technical training sessions will be available on DOER's website.

What are the responsibilities of the Local Government Representative?

Before implementing the consolidated local permitting process, the Local Government should identify a Local Government Representative. For the purposes of 225 CMR 29.00, the Local Government Representative is automatically assigned to the Local Government's Chief Administrative Officer, or their designee(s). Depending on the Local Government, that could be the Mayor, Town Manager, or the Select Board. The Chief Administrative Officer should consider whether they want to keep that responsibility or designate some or all of the duties to one or more other town officials. Local Governments may also assign the role of Local Government Representative to one or more town officials through a bylaw or ordinance.

The Local Government Representative is responsible for:

- Reviewing and determining whether the Applicant has met all Pre-filing requirements and signing the Pre-filing Engagement Completion Checklist
- Receiving the Consolidated Local Permit Application, circulating it among various municipal departments, determining whether it is complete



- Evaluating both the Applicant's Site Suitability Report and proposed Minimization and Mitigation measures
- Compiling the decisions of individual boards and issuing the decision on the Consolidated Local Permit Application.

The Local Government's Chief Administrative Officer may designate all or some of their responsibilities to one or multiple designees.

Does the consolidated local permitting process affect local bylaws and ordinances?

No. The consolidated local permitting process does not affect or displace any local bylaws or ordinances.

Do Local Governments have to adopt a bylaw to be compliant with 225 CMR 29.00?

225 CMR 29.00 does not necessitate Local Governments to update their zoning bylaws. Local Governments may elect to adopt the model permitting bylaw will be made available by DOER. The permitting model bylaw may be used to customize the consolidated permitting process to meet the unique needs of cities and towns. Local Governments should always consult their local municipal counsel when considering adopting a bylaw.

Local Governments may also consider adopting DOER's updated model solar bylaw, and new model storage bylaw. Please be advised that neither DOER's model solar bylaw nor model storage bylaw are offered under the regulatory umbrella of 225 CMR 29.00, nor are they related to the 2024 Climate Act.

- New consolidated local permitting process for small clean energy projects under 225 CMR 29.0
- Email from DOER to Conservation Agent

From: [Castillo, Marcela \(ENE\)](#)
To: [Maureen Pollock](#); [Finn, Doug \(ENE\)](#)
Subject: Re: MAPC subregional 7/9 webinar follow-up (part 2)
Date: Tuesday, July 14, 2026 4:13:32 PM
Attachments: [Outlook-Text Desc.png](#)
[Outlook-Text Desc.png](#)

Hi Maureen,

Thank you for reaching out with your question and happy to provide some additional context. I am also looping in my colleague Doug Finn, the division's new Western Regional Coordinator. Moving forward, he will be the DOER point of contact for Western communities seeking assistance with the regulations.

To address your question, The 2024 Climate Act assigned the EFSB as the permitting authority for all Large Clean Energy Infrastructure Facilities, which are generation facilities 25 MW and above, battery energy storage systems 100 MWh and above, and transmission and distribution facilities over 1 mile in new rights of way. Applicants for large clean energy projects must submit to the EFSB the Consolidated Permit application, which is a single state issued permit, consolidating all of the following requirements, as stated in the 2024 Climate Act:

1. A description of the large clean energy generation facility's or large clean energy storage facility's site and surrounding areas, including any ancillary structures and related facilities and a description of the energy benefits of the large clean energy generation facility or large clean energy storage facility
2. A description of the environmental impacts of the large clean energy generation facility or large clean energy storage facility, including both environmental benefits and burdens
3. A description of the project site selection process and alternatives analysis used in choosing the location of the proposed large clean energy generation facility or large clean energy storage facility to avoid or minimize or, if impacts cannot be avoided or minimized, mitigate impacts
4. Evidence that all pre-filing consultation and community requirements established by the board have been satisfied and, if not, a demonstration of good cause for a waiver of the requirements that could not be satisfied by the applicant
5. A cumulative impact analysis.

Municipalities can participate in the review of these projects by recommending conditions through an intervener status, granted by the state, but not through their own local discretionary process.

I am linking here the regulations for the consolidated permit for clean energy facilities:
[980 CMR 13](#)

My best,
Marcela

Marcela Castillo *(she/her)*

Clean Energy Siting and Permitting Regional Coordinator - Northeast
Massachusetts Department of Energy Resources
100 Cambridge Street, 9th Floor, Boston, MA 02114
Phone: (857)274-0593



Creating a clean, affordable, resilient, and equitable
energy future for all in the Commonwealth.

From: Maureen Pollock <mpollock@montague-ma.gov>
Sent: Tuesday, July 14, 2026 1:43 PM
To: Castillo, Marcela (ENE) <Marcela.Castillo2@mass.gov>
Subject: FW: MAPC subregional 7/9 webinar follow-up (part 2)

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Marcela,

Thanks for providing last week's DOER Clean Energy Siting and Permitting Technical Assistance Session. I have a quick question about the attached slide.

Are large clean energy infrastructure project applications exempt from seeking local discretionary permits (i.e. Special Permit, Site Plan Review, Notice of Intent) or no? Can you clarify this?

Thanks so much,

Maureen

Maureen Pollock *(she/her)*

Planning Director
Town of Montague

Department of Planning & Conservation
1 Avenue A
Turners Falls, MA 01376
Phone: (413) 863-3200 x 112
Web: www.montague-ma.gov/planning
Email: mpollock@montague-ma.gov

From: Hove, Eric <EHove@mapc.org>

Sent: Thursday, July 9, 2026 3:14 PM

To: ssarkisian <ssarkisian@framinghamma.gov>; Rachel Benson <rbenson@bellinghamma.org>; Maureen Pollock <mpollock@montague-ma.gov>; Matthew Benoit <mboenit@milfordma.gov>; rhummel@wayland.ma.us; amweiss@sherbornma.org; Melissa M. SantucciRozzi, Dover Town Planner <msantuccirozzi@doverma.gov>; alove@franklinma.gov; Barbara Saint Andre <bsaintandre@townofmedway.org>; Richard McCarthy <rmccarthy@norfolkmass.gov>; Jason Palitsch <jason@495partnership.org>; Laydon, Joseph <jlaydon@bellinghamma.org>; Aiu, Imaikalani <aiu.i@westonma.gov>; Priscilla Ryder <pryder@marlborough-ma.gov>; sstivers@southboroughma.com; Morena Zelaya <mzelaya@franklinma.gov>; kquinn@southboroughma.com; cook.j@westonma.gov; Heidi Doyle <hdoyle@sherbornma.org>
Cc: Meno, Stephen (ENE) <stephen.meno@mass.gov>; Castillo, Marcela (ENE) <marcela.castillo2@mass.gov>; Koo, Jeremy <jkoo@mapc.org>; Miscioscia, Nina <nmiscioscia@mapc.org>; Dhami, Samikshya <sdhami@mapc.org>

Subject: MAPC subregional 7/9 webinar follow-up (part 2)

Hello again!

I was too fast. Marcela sent along these attachments and links that may be helpful to you as well.

Best,

Eric

From Marcela:

I am following up from today's session with materials mentioned in the chat box. Attached you will find the link to the local government representative guidance, an FAQ for municipal officials, as well as the list of upcoming technical assistance sessions. If anyone would like to catch another session they can reach out to me and I can connect them with the appropriate regional coordinator.

Linked below are digital files of the regulation and the accompanying guidelines. Keep in mind the final version of the guideline on avoidance, minimization, and mitigation has not yet been published, but I am including the draft version. Those you will find below:

[225 CMR 29.00 - Small Clean Energy Infrastructure Facility Siting and Permitting - Clean](#)

Final Guidelines

- **[Pre-filing guidelines](#)**
- **[Public health, safety, and environmental standards](#)**
- **[Common conditions and requirements in case of constructive approval](#)**

Draft Guideline

- **[Minimization and mitigation measures](#)**

The Final Guidance for Site Suitability has been released by EEA and can be accessed below, as well as the link to the site suitability tool.

[Final Site Suitability Guidance](#)

[Massachusetts Clean Energy Infrastructure Site Suitability Mapping Tool \(CEISSM\)](#)

We have also prepared a number of documents that municipalities, applicants, and other stakeholders should use during the consolidated permitting process.

- **[Consolidated Local Permit Application](#)**
- **[Consolidated Local Permit Application Completeness Review Checklist](#)**
- **[Consolidated Local Permit Final Decision Form](#)**
- **[Pre-Filing Engagement Completion Checklist](#)**
- **[Pre-Filing Public Notice Document Template](#)** (DRAFT)
- **[Site Suitability Score Revision Request Form](#)**

BESS Emergency Response Plan Training Session

[Register for Energy Storage Systems & Solar Safety Online Training](#)

Folks can use the code MASSCEC2 to register for free. There should not be an expiration date with this training but please refer folks to me if they experience any trouble registering with the code.

While separate from 225 CMR 29.00 I have also included the model bylaws for Solar and Storage. I will remind that these are drafts and the final versions are expected to be released later this month.

- **[Draft Model Bylaw for Solar](#)**

- [Draft Model Bylaw for BESS](#)

Marcela Castillo *(she/her)*

Clean Energy Siting and Permitting Regional Coordinator - Northeast

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Creating a clean, affordable, resilient, and equitable
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