

Pre-filing Engagement Status Checklist

Updated submission with supporting documentation under 980 CMR 16.04(1)(d)

Carpenter Hill Power, LLC. September 10, 2026. Supersedes the submission of July 28, 2026.

Contents

This packet is our updated Pre-filing Engagement Status Checklist and everything DPP asked us to file with it. Start with [the cover letter](#). Its table lists each of DPP's August 17 items and says where the answer is. Every entry below is a link.

[Cover letter](#) DPP's August 17, August 26, and September 1 items, and where each is answered.

[Pre-filing Engagement Status Checklist \(DPP form\)](#) Part 1 general information. Part 2 status of each requirement. Part 3 supporting documentation. Attestation.

[Appendix A. Public Meeting 1 record \(July 8, 2026\)](#) Content under 980 CMR 16.07, outreach and format under 16.08, Language Demographic Analysis, photographs.

[Appendix A1. Meetings held to date](#) 980 CMR 16.04(1)(d)1. Meetings held, upcoming engagements, agency consultation status.

[Appendix A2. Site suitability and cumulative impact](#) 980 CMR 16.04(1)(d)2. The summary. The analyses are Exhibits B and C.

[Appendix A3. Improvements proposed by agencies](#) 980 CMR 16.04(1)(d)3. Every request, our response, its effect. Status against 980 CMR 16.06(1)(a).

[Appendix A4. Comments received](#) 980 CMR 16.04(1)(d)4. Every comment in date order. Design changes made.

[Appendix A5. Supporting documentation index](#) What is attached, posted, or available on request.

[Attestation](#)

[Appendix B and C \(separate files\)](#) Site Suitability Analysis and Cumulative Impact Analysis, preliminary drafts.

Cover letter

To	Paulina Dieffenbach, Public Policy and Engagement Specialist, Division of Public Participation, Department of Public Utilities
Copies	Veena Dharmaraj, Director, Division of Public Participation; Andrea Nyamekye, Division of Public Participation
From	Wes Shaffer, AICP, Director of Planning and Engagement, ESA Solar, for Carpenter Hill Power, LLC. 1135 Townpark Ave, STE 2125, Lake Mary, FL 32746. wshaffer@esa-solar.com
Project	Carpenter Hill Power, a 150 MW / 600 MWh battery energy storage facility at 131 Carpenter Hill Road, Charlton. Large Clean Energy Storage Facility seeking an EFSB Consolidated Permit under 980 CMR 13.00
Date	September 10, 2026

Your August 31 email asked for three things: a written response to the August 26 discussion, the updated Pre-filing Engagement Status Checklist, and the supporting documentation. This packet is all three. It also records what each agency asked for on September 4 and includes the preliminary Site Suitability and Cumulative Impact analyses as exhibits. It supersedes the checklist and appendix we filed July 28.

Section 1. What is in the packet

- The Status Checklist on DPP's form, signed and dated, with [Attachment A](#): our record of Public Meeting 1 against 980 CMR 16.07 and 16.08, the Language Demographic Analysis, and photographs.
- The appendix, in the order of 980 CMR 16.04(1)(d): A1 meetings held; A2 how site suitability and the cumulative impact analysis inform the design; A3 what agencies asked for and what we did; A4 every comment received; A5 the document index.
- [Appendix B](#), the Site Suitability Analysis (preliminary), from the July 17 tool run.
- [Appendix C](#), the Cumulative Impact Analysis (preliminary), on the EFSB template. Each determination names the study it depends on. The CIA Report is filed with the Application.
- The export of the September 4 consultation slides, and the follow-up packet sent to every invited agency contact.
- Website posting, concurrent with this filing and with personal information removed:
carpenterhillpower.com/files/carpenter-hill-status-checklist-2026-09-10.pdf,
carpenterhillpower.com/files/carpenter-hill-site-suitability-analysis-draft.pdf,
carpenterhillpower.com/files/carpenter-hill-cumulative-impact-analysis-draft.pdf, listed in the Document Library and on the 980 CMR 16.09 page at carpenterhillpower.com/siting-rules.

Section 2. The August 26 discussion

The August 26 call covered four items: Status Checklist updates, the Pre-filing Notice checklist, posting checklist items on the website, and the agency and permit list. Each is answered below. If DPP raised anything we have not answered here, tell us and we will answer in writing within a week.

Item	Response	Where
Status Checklist updates	Section 3 below answers every August 17 item. The form is signed and dated and names one filing month: December 2026 for the Pre-filing Notice and the Completion Checklist, with the Application in February to March 2027.	Form; Section 3 of this letter
Pre-filing Notice checklist	The Completion Checklist goes to DPP, the Board, and the relevant Local Government and state agencies with the Pre-filing Notice in December 2026, with draft applications and draft permits. We keep it pre-filled from the record.	Section A1.2 , December 2026 row
Posting checklist items on the website	We post the form, Attachment A , the appendix, and both exhibits with personal information removed, under the site's 980 CMR 16.09(1)(a)17 entry. We hold sign-in sheets and produce them on request under 16.04(1)(g)5.	Section 1 of this letter
Agency and permit list	Section A1.3 is our list; it replaces the July 28 table and email. We consulted the MEPA Office, MassDEP, and NHESP on September 4. MHC, MassDOT District 3, DCR, the Department of Fire Services, EPA Region 1, and the Charlton boards follow in September and October. The corrected permit matrix no longer describes a MESA filing; we have made none.	Section A1.3 ; Table A3.2 , item 2

Section 3. DPP's August 17 items

DPP item	Response	Where
Resubmit the checklist with the name, title, signature, and date of the authorized representative.	Done. Wes Shaffer, AICP, signs and dates the form and the appendix attestation.	Form; Attestation
State one month for the Pre-filing Notice and Completion Checklist.	December 2026. Application to the Board February to March 2027. The same month appears on the form, in the appendix, on the September 4 slides, and on the website.	Form Part 1; Section A1.2
The appendix footer read 'Draft for internal review'.	Removed. This version is final and supersedes July 28.	Appendix
Post the self-attested checklist and supporting documentation without personal information.	Posted with this filing. Residents appear by initials or as 'a resident'. We do not post sign-in sheets.	Section 1 of this letter; Section A5
The permit and agency list is ours to identify; report updates.	Section A1.3 is our list; changes since July 28 appear above the table.	Section A1.3
Hold the second public meeting after an initial agency consultation.	September 30, 2026, Dexter Hall, sessions at 12:15 and 6:30 PM, after the September 4 consultation. 1,953 mailers went out August 31.	Form Part 2; Section A1.2 ; Table A3.1
Page 6: no environmental justice screening; use MassEnviroScreen for the CIA.	Section A2 replaces the July 28 text. Block group 250277561012 scores 80.9 against the 75 threshold in 980	Section A2.2 ; Exhibit C

DPP item	Response	Where
	CMR 15.04(1)(a), so the site is in a Burdened Area and the CIA continues. Exhibit C is the preliminary analysis.	
Page 6: use the Languages Spoken in Massachusetts Map, not the EJ Map Viewer.	Done. The Language Demographic Analysis finds no language at or above the 5 percent limited-English threshold in either tract within one mile. Spanish and Portuguese continue voluntarily based on the greater Worcester County's language profile.	Attachment A, Section A.4
Once the CIA and site suitability assessment are complete, summarize how they inform design and planning and what agencies proposed.	Section A2 is the summary; Exhibits B and C are the analyses. Agency proposals from September 4 are in Table A3.1 .	Section A2; Table A3.1; Exhibits B and C
Page 7 described April 9 feedback, not the content 980 CMR 16.04(1)(d)3 requires.	Section A3 replaces the July 28 text. Table A3.1 lists every request from DPP, the state agencies, and Charlton officials in date order with our response and its effect. Table A3.2 gives our status against 980 CMR 16.06(1)(a) items 1 to 12.	Section A3
Confirm that the July 8 meeting covered 980 CMR 16.07.	Confirmed. Attachment A, Section A.2 maps the meeting to each item of 16.07(1)(a). Section A.3 records it against 16.08 and states the shortfalls we found.	Attachment A

4. The September 4 consultation

[Table A3.1](#) records each September 4 request and our response, one row each. Four studies joined the program as a result ([Section A2.4](#)): the formal wetland delineation by Request for Determination or Notice of Intent this fall (MassDEP); the rare species information request signed by the landowner or lessee (NHESP); an environmental alternatives analysis of siting and design options that reduce footprint and clearing (MEPA Office); and stormwater designed to the Climate Resilience Design Standards Tool's 2070 storm, or the departure documented (MEPA Office). We have asked the MEPA Office to confirm in writing that the project is not expected to trigger MEPA review on its own. Attendance is in [Table A1.1](#).

5. Your September 1 request: outreach beyond the scheduled events

- 1,953 mailers for the September 30 meeting went to Charlton households on August 31, a month ahead.
- We left stacks of the mailer with the Overlook (August 31) and, at Old Home Day on September 6, with Bill Fontaine of the Planning Board and community groups tabling nearby (Boy Scouts, Senior Center, Overlook, Economic Development Committee, a parish group), as Mr. Fontaine suggested on August 27.
- We tabled at Old Home Day on the Town Common on September 6.
- The Kitchen Table Talks set for September 5 are postponed. We will post the new date once we set it with the Carpenter Hill Road households.
- We held an introductory call with Bay Path Regional Vocational Technical High School on September 8 about tying its trades curriculum to the project. Both sides will inventory the credentials the project needs and match them to coursework.
- The Citizen Advisory Committee met September 10 (virtual), opening with a half hour of questions from any resident. The draft Community Benefits Plan and the preliminary analyses ([Exhibits B and C](#)) went to the committee. Five local residents attended.

Planned: the second public meeting September 30 (12:15 to 1:15 PM and 6:30 to 8:00 PM, Dexter Hall); public comment on the draft Community Benefits Plan in October through November 30; a third public meeting in early November on the revised draft; one-on-one consultations with MHC, MassDOT District 3, DCR, the Department of Fire Services, EPA Region 1, and the Charlton boards in September and October; and targeted outreach to the groups Mr. Fontaine listed. We report each event to DPP as it is scheduled and log it on the website.

6. Open items we owe DPP

- The MEPA Office's written position on MEPA review, filed with the Completion Checklist.
- Notes of the August 25 CMRPC briefing.
- Comments from Old Home Day and the rescheduled Kitchen Table Talks, added to [Section A4](#) in the next update; the Bay Path credential inventory.
- Confirmation of our reading that 980 CMR 16.06(1)(a)7 does not apply because the gen-tie is a component inside the Facility Boundary.

Questions on this submission: wshaffer@esa-solar.com.

Name: **Wes Shaffer, AICP**
Title: **Director of Planning and Engagement, ESA Solar, on behalf of
Carpenter Hill Power, LLC**
Date: **September 10, 2026**

Signature: Wes Shaffer

Pre-filing Engagement Status Checklist

Division of Public Participation, 980 CMR 16.00. Carpenter Hill Power, LLC. Updated submission dated September 10, 2026; supersedes the checklist submitted July 28, 2026. The Applicant submits this checklist to DPP approximately midway through the Pre-filing Outreach Period and attaches the supporting documentation listed in Part 3 as an appendix.

Part 1: General information

Applicant legal name	Carpenter Hill Power, LLC (a Delaware limited liability company registered with the Secretary of the Commonwealth; parent ESA a.k.a. Solar Development Group, LLC)
Applicant common name	Carpenter Hill Power
Applicant representative	Wes Shaffer, AICP, Director of Planning and Engagement, ESA. 1135 Townpark Ave, STE 2125, Lake Mary, FL 32746. wshaffer@esa-solar.com
Project type	Large Clean Energy Storage Facility: 150 MW / 600 MWh battery energy storage. EFSB Consolidated Permit under 980 CMR 13.00.
Project name	Carpenter Hill Power
Plain language description	A battery energy storage facility that charges from the regional grid and sends power back when the grid needs it. 150 megawatts, 600 megawatt hours, on a fenced area next to the existing Carpenter Hill substation.
Project location	131 Carpenter Hill Road, Charlton, Massachusetts (parcel 43-A-1), with a generation tie line easement to the point of interconnection at the Carpenter Hill substation.
Main project webpage	https://carpenterhillpower.com
Anticipated Pre-filing Notice	December 2026. Application to the EFSB February to March 2027.
Start of Pre-filing Outreach Period	April 9, 2026 (DPP and OEJE kickoff meeting)

Part 2: Status of pre-filing consultation and engagement requirements

An X marks the status of each task. The dates, names, or channels the task asks for follow the task wording, then the section of this packet that holds the record.

Complete	In progress	Not started	Task	Entry
	X		Met with DPP and EEA's Office of Environmental Justice and Equity (OEJE) to share the proposed engagement plan and clarify pre-filing consultation and engagement requirements. Date(s):	April 9, 2026 (kickoff, DPP and OEJE); July 20, 2026 (follow-up, DPP and OEJE); August 26, 2026 (DPP follow-up); September 4, 2026 (interagency consultation convened by DPP). Table A1.1 .
	X		Consulted site suitability criteria, cumulative impacts analysis guidance, and the cumulative impact analysis tool, and communicated during the Pre-filing Outreach Period how they informed the selection of the preferred site.	Official Site Suitability Mapping Tool run July 17, 2026 (provisional; re-run on the 17.29-acre Facility Boundary before the Pre-filing Notice). MassEnviroScreen review complete: the site is in a Burdened Area. Shared with the agencies September 4 and the Citizen Advisory Committee September

Complete	In progress	Not started	Task	Entry
				10; public presentation September 30. Section A2 ; Exhibits B and C .
	X		Demonstrated efforts to inform, involve, and partner with Key Stakeholders and the Community during the Pre-filing Outreach Period.	Citizen Advisory Committee formed June 3, 2026 (met June 3, August 4, September 10). CMRPC briefed August 25; MassHire Central Region Workforce Board August 14; Bay Path Regional Vocational Technical High School September 8; Massachusetts Commission on Indian Affairs written August 10 (response pending). Sections A1.1 and A1.2 .
	X		Publicized project information using multiple outreach channels. Channels used:	Project website; email distribution list; direct mail (town-wide postcard for July 8; 1,953 mailers for September 30, mailed August 31, plus copies through community groups); flyers and posters at Town Hall; Town of Charlton event board and Planning Board Facebook page; Charlton Villager notice; project social media; tabling (Annual Town Meeting May 18; Old Home Day September 6); recorded fire safety webinar August 19. Attachment A, Section A.3 .
	X		Maintained up-to-date project webpage(s) as information became available.	carpenterhillpower.com carries the engagement log, Document Library, meeting materials and recordings, comment form, and a page tracking each 980 CMR 16.09 requirement. This packet posts with personal information removed, concurrently with this filing.
	X		Met with Key Stakeholders and provided quarterly updates.	Select Board April 14; Annual Town Meeting May 18; Planning Board June 3; Citizen Advisory Committee June 3, August 4, September 10; Town Administrator June 4; department heads July 8; Fire Department August 4 and ongoing; fire safety webinar August 19; CMRPC August 25; Bay Path September 8. Table A1.1 .
	X		Discussed a Community Benefits Plan (CBP) and/or Community Benefits Agreement (CBA) with relevant Key Stakeholders.	Benefits priorities exercise July 8; Citizen Advisory Committee August 4 and September 10 (draft plan); public comment October through November 30, 2026. Table A3.1 ; Section A4.
X			Submitted the Pre-filing Engagement Status Checklist and supporting documentation to DPP.	July 28, 2026. Updated submission September 10, 2026 (this filing).
X			Completed consultation(s) with the MEPA Office. Date(s):	September 4, 2026, at the interagency consultation convened by DPP. We have

Complete	In progress	Not started	Task	Entry
				requested the Office's position in writing. Section A1.3; Table A3.1.
	X		Completed all relevant Agency Consultations. Agencies consulted and meeting dates:	September 4, 2026 (convened by DPP): DPU Siting Division (EFSB staff); EEA MEPA Office; MassDEP Central Regional Office; MassWildlife NHESP. Local Government: Planning Board June 3; Town Administrator June 4; department heads July 8; Fire Department August 4. Planned September to October: MHC, MassDOT District 3, DCR, Department of Fire Services, EPA Region 1, Charlton boards and departments. Section A1.3; Table A3.1.
X			First public meeting for Key Stakeholders and Community. Date:	July 8, 2026, 5:30 to 7:30 PM, Charlton Public Library; in person with Zoom; about 40 in the room; recorded by the Town. Attachment A.
		X	Second public meeting for Key Stakeholders and Community. Date:	Scheduled September 30, 2026, Dexter Hall, Charlton Public Library, two sessions (12:15 to 1:15 PM and 6:30 to 8:00 PM), after the September 4 Agency Consultation as DPP recommended.
	X		Translated outreach materials and provided interpretation as the current Board Language Access Plan requires. Non-English languages used:	Spanish and Portuguese, voluntarily, on the website and written materials. The Language Demographic Analysis, by the method in the Board's draft plan, identifies no language that requires translation or interpretation. Both are available on request. Attachment A, Section A.4.
X			Pre-filing comment period commenced on:	April 14, 2026, when we introduced the project to the Select Board. Open through at least three weeks after the third public meeting planned for early November 2026.

Part 3: Supporting documentation

The documentation required by 980 CMR 16.04(1)(d)1 through 4 is attached as the appendix, in the same order:

1. List of Key Stakeholder, Agency Consultation, and Community meetings held to date, with date, time, and location. [Section A1.](#)
2. Summary of how the site suitability criteria, cumulative impact analysis requirements, and cumulative impact analysis tool are informing Project design and planning. [Section A2](#), with [Exhibit B](#) and [Exhibit C.](#)
3. Summary of related improvements proposed by Local Government or state agencies during Agency Consultation, with our status against 980 CMR 16.06(1)(a) items 1 to 12 as the agencies asked on September 4. [Section A3.](#)
4. Table of oral and written comments received, all issues raised, and any design modifications in response. [Section A4.](#) The document index is [Section A5.](#)

Attestation

All information provided is complete and accurate to the best of my knowledge. Upon request, I agree to provide DPP with additional information or documentation.

Name of signatory: **Wes Shaffer, AICP**

Title: **Director of Planning and Engagement, ESA Solar, on behalf of
Carpenter Hill Power, LLC**

Date: **September 10, 2026**

Signature: Wes Shaffer

Attachment A. Public Meeting 1 record (July 8, 2026)

One record of the first mandatory public meeting: what it covered under 980 CMR 16.07, how we noticed and ran it under 980 CMR 16.08, the Language Demographic Analysis, what we are changing for September 30, and the evidence.

A.1 The meeting

We held Public Meeting 1 on Wednesday, July 8, 2026, 5:30 to 7:30 PM, in Dexter Hall at the Charlton Public Library, 40 Main Street. It ran as an open house with topic stations, a presentation at 6:30 PM, and a read-back of resident comments at the end. Zoom participation was available and several people joined that way. About 40 residents attended in the room. The Town of Charlton recorded the meeting. We posted the recording, a written summary, and written answers to every question on July 17 at carpenterhillpower.com/engagement-log.

A.2 Content against 980 CMR 16.07(1)(a)

On August 17 DPP asked us to confirm that the meeting covered 980 CMR 16.07. The recording of the presentation and Q&A is at youtube.com/watch?v=b5Ghta0UOMU; the open-house hour was not filmed. The table maps the meeting to each item of 16.07(1)(a). Item 3 (route alternatives for transmission facilities) does not apply. Translation and interpretation on request under 16.07(1)(c) is in [Section A.4](#); the notice and format record is [Section A.3](#).

Item	Requirement (short form)	How the July 8 meeting covered it, and the record
(a)1	Plain-language description of the Project, the reason for the Project, potential benefits and impacts on the Community, and a location map.	We presented what the facility does, why storage belongs at this substation, and the benefits and impacts (recording; July 28 appendix, Section 4). Our Project Location poster (1 inch to 0.5 mile) showed the site, substation, transmission lines, residences, and nearby energy facilities. The one-mile landmark map was on the website by July 28, 2026.
(a)2	Describe anticipated impacts and solicit input on minimization and mitigation.	Our Land, Water and Trees poster covered soils, drainage, wetlands, clearing of about 10 acres, and soil handling, and asked residents to report springs, seeps, and wet ground. Dot boards and comment cards collected priorities. We answered questions on runoff, plume modeling, replanting, and erosion controls (engagement log, July 8 entry).
(a)4	Site selection process, anticipated health, environmental, and safety impacts, and proposed mitigation.	We explained the site choice: the 345 kV line and substation built here in the 1960s, a backbone substation between Springfield and Boston, with storage next to it (recording; Why Charlton poster). We presented and answered questions on fire safety, wells and groundwater, noise, traffic, and tree clearing (July 28 appendix, Section 4).
(a)5	Discuss decommissioning and site restoration plans under 980 CMR 1.10.	We presented decommissioning and site restoration (July 28 email to DPP; recording) and handed out a decommissioning station handout (supporting documentation folder 03). Answers covered the roughly 30-year life, a bond posted before operation, battery reuse or material recovery, land restoration, and obligations carrying to any future owner (July 28 appendix, Section 4). Those answers reflect what we said July 8; the current plan, with financial assurance before construction, is in Section A2.4 .
(a)6	Estimated timeline for filing the Pre-filing Notice and future opportunities for comment or input.	We said nothing had been filed; the project was in the pre-filing period of the Board's Consolidated Permit process, with about six more months of engagement before filing. We named monthly touch points, the fire safety webinar, Old Home Day, and a fall public meeting (recording). We

Item	Requirement (short form)	How the July 8 meeting covered it, and the record
		set the Pre-filing Notice month, December 2026, after the meeting (Section A1.2).
(a)7	Project contact person(s) with email, phone, and mailing address.	We directed residents to the named project contact and the website comment form (July 28 appendix, Section 4), and offered email or Zoom follow-up to anyone who left their information (recording). The website carries the contact block with email, phone, and mailing address.
(a)8	Project-specific issues or topics of interest to Key Stakeholders and the Community; topics may be solicited ahead of meetings.	We built the three open-house stations and posters around topics residents had raised since April (fire safety, wells and water, noise, traffic, benefits, decommissioning). The benefits priorities exercise collected topics for later meetings. Posters and dot boards are in the Document Library.
(a)9	Link to the main Project webpage.	We named carpenterhillpower.com in the presentation as where every question and answer would be posted, and promised written answers for July 17 (recording). The address appeared on the postcard, email invitation, newspaper notice, and flyer (Attachment A).
(a)10	Paper copies of Project materials to Key Stakeholders on request.	We distributed printed handouts, including the decommissioning station handout, at the meeting; they remain available on request (supporting documentation folder 03; Document Library).
(a)11	How to sign up to the Project email distribution list.	We asked attendees who had not yet added their email to do so, as the fastest way to receive project information (recording). Sign-in sheet on file (980 CMR 16.04(1)(g)5).
(a)12	Update on ongoing community benefits plan discussions.	We described the Community Benefits Plan we are developing with the community, the Citizen Advisory Committee's role, and the difference between a plan and a signed agreement (recording; July 28 appendix, Section 4). Dot boards collected benefit priorities; they are on the project website.

A.3 Outreach and format against 980 CMR 16.08(1)

Met means we satisfied the requirement, and the evidence is in the supporting documentation. Met in part means some but not all materials satisfy it. Not met means we fell short.

16.08(1)(a) Outreach for the public meeting

Provision	Requirement	Status	How it was met, and the evidence
(a)	Tailor outreach for public meetings to the Project and characteristics of potentially impacted populations and publicize Project information using at least two outreach channels that have wide reach within the Community.	Met	Channels: project website (meeting posted April 25, 2026); project email distribution list (June 23, 2026, including town officials); Town of Charlton event board at Town Hall (posted by the Town June 24, 2026); Charlton Villager display ad (published July 3, 2026); Charlton Planning Board Facebook post (July 3, 2026), shared by the Charlton Area Community Forum group (July 6, 2026); project flyer on the Town Hall board (by May 18; handed out at the May 18 Town Meeting and the June 3 Citizen Advisory Committee meeting). We also mailed a town-wide postcard to 5,414 Charlton addresses; it arrived late. It carried Spanish and Portuguese pointer lines.

Provision	Requirement	Status	How it was met, and the evidence
(a)1	Outreach channels can include, but are not limited to, door knocking, emails, phone calls, social media posts, flyers posted in community gathering spaces, radio spots, and contacting local cable channel(s). The Applicant may consult with local officials and community-based organizations on the appropriate outreach channels that will have the broadest reach in the Project area including multi-media and multi-cultural media options.	Met	We consulted on channels with DPP and OEJE (April 9, 2026 kickoff), the Charlton Select Board (April 14, 2026), the Charlton Planning Board (June 3, 2026), and citizen advisors, some representing local community organizations, at the first Citizen Advisory Committee meeting (June 3, 2026). We evaluated radio and local cable but did not use them.
(a)2	Outreach materials shall note the availability of intervenor funding to eligible entities through the Department and the Board's Intervenor Support Grant Program and include a link to the program website.	Met in part	The project website has carried a reference and link to the intervenor program since April 2026. We have not included it prominently in flyers, emails, or other outreach materials.
(a)3	Outreach materials shall include information on how to request translation and/or interpretation services.	Met in part	The email invitation said how to request interpretation or translated materials. The postcard sent Spanish and Portuguese readers to the website for information in those languages. The newspaper ad did not mention translation or interpretation services. Since July 19, 2026 every website event listing carries a standing request line with a named contact.
(a)4	Outreach materials shall link to the Applicant's Project webpage.	Met	carpenterhillpower.com appears on the postcard (front, back, and QR code), the email invitation, the newspaper ad, and the flyer.
(a)5	Paper copies of the outreach materials shall be available for review in municipal office buildings (e.g., clerk's office) and public libraries within the municipality(ies) in which the proposed Project boundaries fall, and locations suggested by Key Stakeholders and members of the Community. Upon request, Applicant shall provide paper copies of outreach materials to Key Stakeholders and members of the Community.	Met in part	We posted the project flyer on the Town Hall board by May 18, 2026; the Town posted the meeting on its own event board June 24, 2026. We held the meeting at the Charlton Public Library. We did not place paper notices at the library or the Town Clerk's counter. No stakeholder suggested locations, and no one requested paper copies.

16.08(1)(b) Guidelines for public meetings

Provision	Requirement	Status	How it was met, and the evidence
(b)1	Hold public meetings in a format that allows for both in-person and virtual participation, where possible.	Met	In person at the library, with Zoom participation; several attendees joined remotely, and we disclosed the recording. The postcard and newspaper notice advertised

Provision	Requirement	Status	How it was met, and the evidence
	Applicants are encouraged to record the presentation portion of meetings with a virtual component. Applicants must disclose that the meeting is recorded at the start of the meeting and upload the recording to the Project webpage.		both options. The Town of Charlton recorded part of the meeting; we posted that recording on the project website with a follow-up video answering resident questions, and posted the meeting content July 17, 2026 in the engagement log entry for Public Meeting 1 with written answers to every question.
(b)2	Translate flyers announcing the public meetings, the meeting agenda, presentation, and other materials and provide simultaneous interpretation according to the current Board Language Access Plan.	Met	The Language Demographic Analysis below, run by the method in the Board's draft Language Access Plan (version posted as of September 4, 2026), finds no language at or above the 5% limited-English threshold in either tract within one mile of the site. Under the plan, the meeting required no translated materials or interpretation. We provided the Spanish and Portuguese postcard lines voluntarily and offered interpretation and translated materials on request; no one requested them.
(b)3	Provide translation and interpretation in additional languages as requested.	Met	We made the offer in the email invitation. No requests for this meeting.
(b)4	Hold public meetings at reasonable times that reflect Community availability (e.g., weekends and evenings) and in accessible locations that Community members routinely use (e.g., community centers and public libraries). Applicants are encouraged to consult with Key Stakeholders regarding the most appropriate time and place for Community meetings.	Met	Weekday evening, 5:30 to 7:30 PM, at the public library, in a second-floor hall with an elevator named on every entrance sign. Charlton Planning Board feedback on June 3, 2026 shaped the schedule, and we asked attendees July 8 when and where to hold the next meeting. In response, the September 30 meeting offers midday and evening sessions.
(b)5	Where possible, meeting locations shall be near public transit and/or have ample no-cost parking.	Met	Free parking in the library lot, with wayfinding signs at its entrance.
(b)6	Provide notice of the public meeting at least two weeks in advance and communicate event date/time through a variety of outreach channels, including the Project email distribution list.	Met	Project website: April 25, 2026 (74 days). Project email distribution list: June 23, 2026 (15 days). Town of Charlton event board: June 24, 2026 (14 days). Project flyer at Town Hall: by May 18, 2026 (51 days). Inside two weeks: Charlton Villager ad and Charlton Planning Board Facebook post, July 3 (5 days); Charlton Area Community Forum share, July 6 (2 days). The direct-mail postcard arrived late.

A.4 Language Demographic Analysis

The Board's draft Language Access Plan (posted as of April 3, 2026; no final plan has been issued) directs a Language Demographic Analysis for each project: identify every census tract wholly or partly within one mile of the facility, and test each for any language spoken by at least five percent of the population who also speak English less than very well. Where a language meets the test, the applicant translates notices and provides interpretation.

We ran the analysis on April 3, 2026 with the state's Languages Spoken in Massachusetts map layer (American Community Survey 2011 to 2015, table B16001, by tract), the data behind EEA's map viewer, and cross-checked it against the 2019 to 2023 release. Two Charlton tracts fall within one mile: 7561.01, which contains the parcel, and 7561.02.

Tract	Population age 5 and over	Any language at or above 5% limited-English?	Highest limited-English share, state map layer	Highest limited-English share, 2019 to 2023 ACS
7561.01	4,365 (2015); 4,857 (2023)	No	Arabic, 1.37%	German or other West Germanic, 0.64%
7561.02	8,173 (2015); 7,734 (2023)	No	French, 0.31%	Russian, Polish, or other Slavic, 0.41%

No language in either tract comes within a factor of seven of the threshold. Under the Board's plan, Public Meeting 1 required no translated notices or interpretation. We provide Spanish and Portuguese materials voluntarily and honor requests for interpretation or translation. We adopted Spanish and Portuguese in April 2026 after the April 9 kickoff with DPP and OEJE because they are the two most widely spoken languages after English in Worcester County, not because of this analysis. This analysis replaces the environmental justice screening language in the July 28 submission. We will re-run it if the Board finalizes its plan with a different method or the state updates the map layer.

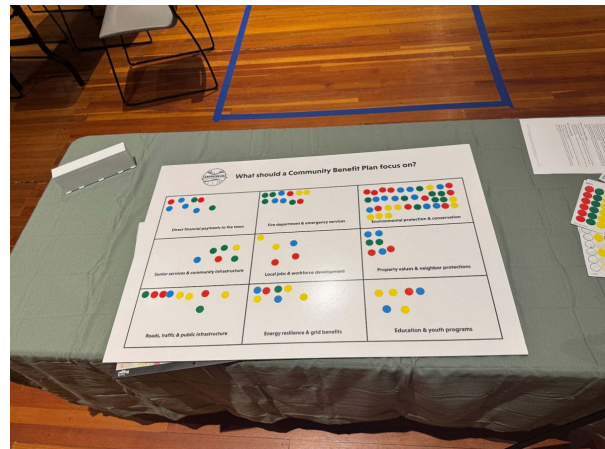
A.5 What we acknowledge, and what changes for September 30

- Recording disclosure. We announced our Zoom recording at the start but not the Town's recording of the room, which we did not know about in advance. For September 30, the disclosure is scripted into the opening and printed on the door sign.
- Direct mail. The town-wide postcard arrived late or not at all because the vendor failed. We said so on the website July 9 and at the August 4 committee meeting, and committed to mailed notice at least a month ahead. Direct mail is not a required channel under 16.08; notice through the website, email list, Town event board, newspaper, and municipal social media stands on its own.
- Content of every material. The newspaper ad lacked the intervenor funding note; the postcard and ad lacked instructions for requesting language services. Every September 30 notice carries the Intervenor Support Grant Program note and link, the website, and how to request translation or interpretation.
- Paper copies. For September 30, paper notices go to Charlton Town Hall and the Charlton Public Library, with placement dates logged.

A.6 Photographs



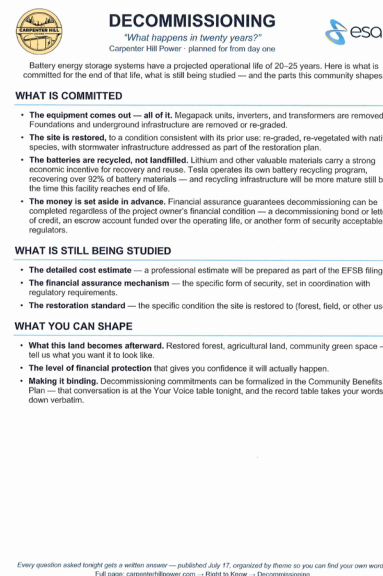
Presentation and Q&A, Dexter Hall, July 8, 2026. Frame from the Town of Charlton recording.



Community Benefits Plan dot board, one of the open-house stations, July 8, 2026.



Project Location poster, open-house station, July 8, 2026. All posters: carpenterhillpower.com/files/carpenter-hill-public-meeting-1-posters.pdf.



Decommissioning handout provided to public meeting attendees, July 8, 2026.

A.7 Evidence in the supporting documentation

Folder 03, Public Meeting 1 Evidence: outreach log (revised September 4, 2026); postcard artwork and USPS route confirmation; June 23 email invitations; Charlton Villager ad and submission email; notice copy and flyer; recording transcript; written answers of July 17; sign-in sheet (held, produced to DPP on request, not posted, 980 CMR 16.04(1)(g)5); photograph of the Town's event board (IMG_6375.jpg). Screenshots of the Facebook posts and the Zoom attendance report will follow. The Language Demographic Analysis memo and its data are in folder 05. Posters and dot boards: [Section A5](#), item 7.

Appendix A1. Meetings held to date (980 CMR 16.04(1)(d)1)

Required: a list of Key Stakeholder, Agency Consultation, and public meetings with the Community held to date, with date, time, and location. The Pre-filing Outreach Period began April 9, 2026. We have accepted comments since April 14, 2026, and keep the comment period open through at least three weeks after the third public meeting in early November 2026. Times are Eastern. Where our record lacks a time or attendee list, the row says so. Residents are not named; we hold sign-in sheets and produce them on request under 980 CMR 16.04(1)(g)5. One-on-one calls and correspondence are in Section A4.

A1.1 Meetings held, April 9 through September 10, 2026

Table A1.1. Meetings held to date

Date	Meeting or engagement	Type	Time and location or format	Participants (summary; "Invited" where taken from the invitation)
April 9, 2026	Pre-filing kickoff with DPP and OEJE	DPP and OEJE consultation, 980 CMR 16.04(1)(b)	11:00 AM. Zoom.	DPP and OEJE staff. ESA team. Notes on file.
April 14, 2026	Charlton Select Board, project introduction and engagement plan	Key Stakeholder meeting, Local Government, 980 CMR 16.04(1)(c)	6:30 PM. Charlton Town Hall, Meeting Room 1, in person. Town-recorded.	Select Board members, Planning Board alternate L. Degnan, residents. ESA team. We accepted comments from this meeting onward. Summary on file.
May 18, 2026	Annual Town Meeting outreach table	Community outreach, 980 CMR 16.04(1)(a)6	Charlton Annual Town Meeting, in person. Time not recorded.	Residents, Fire Chief Rob Barton, Bill Fontaine (Planning Board), and the landowner, visited at home that day. ESA team. We handed out materials and collected questions and advisory committee interest.
June 3, 2026	Citizen Advisory Committee meeting 1	Advisory body, supplemental engagement, 980 CMR 16.04(1)(g)3	4:00 to 6:00 PM. Community Meeting Room, Charlton Public Library, in person.	12 attendees, including Charlton Fire Department representatives. ESA team. Minutes in the Document Library.
June 3, 2026	Charlton Planning Board, project introduction	Agency Consultation and Key Stakeholder meeting, Local Government, 980 CMR 16.04(1)(f)	7:00 PM. Charlton Town Hall, in person. Town-recorded.	Planning Board members and residents. ESA team. We announced the first public meeting here. Transcript on file.
June 4, 2026	Town Administrator Andrew Golas	Agency Consultation, Local Government, 980 CMR 16.04(1)(f)	9:00 AM. Charlton Town Hall, in person.	Town Administrator A. Golas. ESA team. Summary on file.
July 8, 2026	Town department directors briefing	Agency Consultation, Local Government, 980 CMR 16.04(1)(f)	9:00 AM. Charlton Town Hall, in person.	Charlton department directors, convened by the Town Administrator. ESA team. Site plan walkthrough, discussion of intervenor program, and staff questions.
July 8, 2026	Public Meeting 1, first mandatory public meeting	Public meeting, 980 CMR 16.04(1)(g)1	5:30 to 7:30 PM. Charlton Public Library, in person plus	About 40 in the room. One hour of open-house stations, then presentation and Q&A. ESA team.

Date	Meeting or engagement	Type	Time and location or format	Participants (summary; "Invited" where taken from the invitation)
			Zoom. Town-recorded.	Sign-in sheet on file. Recording and written answers posted July 17, 2026. Attachment A also records this meeting.
July 20, 2026	Follow-up consultation with DPP and OEJE	DPP and OEJE consultation, follow-up, 980 CMR 16.04(1)(b)	4:00 to 5:00 PM. Microsoft Teams.	Invited: DPP and EEA/OEJE staff; local Charlton members of the Community Advisory Committee; ESA team.
August 4, 2026	Charlton Fire Department introductory meeting	Agency Consultation, Local Government, 980 CMR 16.04(1)(f)	11:00 AM to 12:00 PM. Zoom.	Invited: Fire Chief Rob Barton, Fire Inspector J. Clark, our third-party fire safety consultant, ESA team. Agenda: fire protection, emergency access, hazard mitigation, thermal runaway response, site shutdown, the department's incident role.
August 4, 2026	Citizen Advisory Committee meeting 2	Advisory body, supplemental engagement, 980 CMR 16.04(1)(g)3	7:00 to 8:30 PM. Zoom, recorded.	About 20 residents and a Charlton Planning Board member. ESA team. Topics: well and groundwater protection, fire department readiness, long-term financial assurance, Community Benefits Plan priorities. Minutes and slides published August 24, 2026.
August 14, 2026	MassHire Central Region Workforce Board	Key Stakeholder meeting, labor and workforce organizations, 980 CMR 16.02	10:00 AM. Zoom.	Jeffrey Turgeon, Executive Director. ESA team. Project introduction and workforce interests. No written notes on file.
August 19, 2026	Fire Safety Webinar, two identical sessions	Topic-specific session, 980 CMR 16.04(1)(g)3	Session 1, 12:00 to 1:00 PM. Session 2, 7:00 to 8:00 PM. Zoom, recorded. Recordings posted August 31, 2026.	Our third-party fire safety consultant presented. Fire Chief Rob Barton and Fire Inspector J. Clark joined session 1. ESA team. Topics: fire safety, thermal runaway, emergency response.
August 25, 2026	Central Massachusetts Regional Planning Commission staff briefing	Key Stakeholder meeting, regional planning officials, 980 CMR 16.02	2:00 to 2:30 PM. Zoom.	CMRPC: R. Barron, Director of Land Use and Zoning, and invited staff. ESA team. Notes in progress.
August 26, 2026	DPP follow-up on the July 28 Status Checklist submission	DPP consultation, voluntary follow-up. EEA staff invited.	2:00 to 3:00 PM. Zoom.	Invited: DPP and EEA staff; ESA team. Agenda: Status Checklist updates, Pre-filing Notice checklist, posting checklist items on the website, confirming the agency and permit list. The cover letter addresses each item.
September 4, 2026	Interagency consultation convened by DPP	MEPA Office and Agency Consultation, 980	1:00 to 2:30 PM. Microsoft Teams.	Attended: DPP (Dharmaraj, Dieffenbach, Nyamekye); EFSB staff (Greene, Wang, Kelleher, Murphy);

Date	Meeting or engagement	Type	Time and location or format	Participants (summary; "Invited" where taken from the invitation)
		CMR 16.04(1)(e) and (f)		MEPA (Kim, Hughes); MassDEP (Lyons, Schmitz); NHESP (Glorioso); ESA team. OEJE was invited and is not recorded as attending. Requests and responses: Table A3.1 .
September 6, 2026	Tabling at Charlton Old Home Day	Community outreach, 980 CMR 16.04(1)(a)6	Town Common, Charlton, in person.	Residents asked questions and took the September 30 public meeting mailer. We left mailer stacks with Bill Fontaine (Planning Board) and five groups tabling nearby, as offered in our August 31 reply. Comments: Section A4.
September 8, 2026	Bay Path Regional Vocational Technical High School, introductory call	Key Stakeholder outreach, workforce and education, 980 CMR 16.04(1)(c)	11:30 AM. Zoom.	Held. Bay Path staff, ESA team. We discussed tying the school's trades curriculum to the project. Agreed: identify the credentials the project will need, then map them to coursework. Next steps: Table A1.2 .
September 10, 2026	Citizen Advisory Committee meeting 3	Advisory body, supplemental engagement, 980 CMR 16.04(1)(g)3	7:00 to 8:30 PM. Zoom, recorded.	Held. Thirty minutes of open resident questions, then the committee agenda: draft Community Benefits Plan, anticipated site suitability scores, preliminary Cumulative Impact Analysis (Exhibits B and C). Five local residents attended.

Meeting notes under 980 CMR 16.04(1)(a)4 are on file for April 9, April 14, June 3 (committee and Planning Board), and June 4 ([Section A5](#), item 1). The August 4 committee minutes, the July 8 transcript and answers, and the August 19 webinar recordings are on the website. Notes for August 25 (CMRPC) are still needed; our September 4 notes are on file ([Section A5](#), item 2). No written record exists for July 20; the August 26 record is the agenda.



Select Board, April 14, 2026



Annual Town Meeting table, May 18, 2026



Citizen Advisory Committee meeting 1, June 3, 2026



Planning Board, June 3, 2026



Public Meeting 1, July 8, 2026



Old Home Day, September 6, 2026

A1.2 Upcoming engagements as of September 10, 2026

The second mandatory public meeting is September 30, 2026, after the September 4 consultation with the MEPA Office and the state permitting agencies, as DPP recommended on August 17.

Table A1.2. Upcoming engagements

Date	Engagement	Type	Time and location or format	Status and notes
September to October 2026	Kitchen Table Talks with Carpenter Hill Road neighbors	Key Stakeholder outreach, abutters, 980 CMR 16.04(1)(c)	Neighbors' homes, in person. Times set with each household.	Postponed from September 5, 2026. We will set a new date with the households and post it on the website. Guided talks on remaining concerns and ideas for site design and the Community Benefits Plan.
September 30, 2026 (Wednesday)	Public Meeting 2, second mandatory public meeting	Public meeting, 980 CMR 16.04(1)(g)2	Dexter Hall, Charlton Public Library, in person. Session 1, 12:15 to 1:15 PM. Session 2, 6:30 to 8:00 PM.	Scheduled. Follows the September 4 Agency Consultation, per DPP's August 17 recommendation. We will present design changes, our response to first-meeting input, anticipated site suitability scores, and the draft Community Benefits Plan.
September to October 2026	Follow-up individual agency consultations	Agency Consultation, 980 CMR 16.04(1)(f)	Virtual or in person. To be scheduled.	Massachusetts Historical Commission, MassDOT District 3, DCR. Local: Conservation Commission, Board of Health, DPW, Building Commissioner. MassDEP, NHESP, and MEPA Office follow-ups run alongside (Table A3.1) .
September to October 2026	Bay Path Regional Vocational Technical High School, credential inventory and follow-up meeting	Key Stakeholder outreach, workforce and education, 980 CMR 16.04(1)(c)	Virtual or at the school. To be scheduled.	Planned. Follows the September 8 call (Table A1.1) . We compile the credentials the project will need; Bay Path and we map them to coursework.

Date	Engagement	Type	Time and location or format	Status and notes
October 2026	Public comment period opens on the draft Community Benefits Plan	Community input, 980 CMR 16.04(1)(g)4	Website form, email, or in person at any fall event.	We post the opening date when set. Comment runs through November 30, 2026. We will answer every comment and show how feedback shaped the plan.
Early November 2026	Third public meeting, revised draft Community Benefits Plan	Public meeting beyond the two required, 980 CMR 16.04(1)(g)3	Charlton, in person. Date, time, and location to be posted.	Committed at the April 9 consultation. Presents a revised draft reflecting October comments. Comment period stays open at least three weeks after this meeting.
November 30, 2026	Community Benefits Plan comment closes; final draft published	Community input	Online	Comment closes. Final draft published on the website.
December 2026	Pre-filing Notice and Pre-filing Engagement Completion Checklist	980 CMR 16.04(1)(h) and (i)	Filed with DPP, the Board, and relevant local and state agencies	We give agencies draft applications and draft permits with the Notice. Application to the Board anticipated February to March 2027.

Of the Key Stakeholder categories flagged July 28, we have reached regional planning officials (CMRPC, August 25) and labor and workforce organizations (MassHire, August 14). Tribes remain open: we wrote to the Massachusetts Commission on Indian Affairs on August 10 for the protocol for contacting the Chaubunagungamaug Nipmuck Indian Council and the Nipmuc Nation Hassanamisco Council; no reply yet, and we are following up. Building trades outreach is pending. Results go in the Completion Checklist.

A1.3 Agency consultation status as of September 10, 2026

This is our working list under 980 CMR 16.06(1)(a)2 and 980 CMR 13.05(1); consultation and the Board's decision settle the definitive list. Since July 28: we consulted the MEPA Office, MassDEP, and NHESP on September 4 rather than later in the fall; DCR, the Department of Fire Services, the MassDOT / MBTA contact, CMRPC, the Commission on Indian Affairs, and the New England Power easement holder have their own rows; we have made no MESA filing.

Table A1.3. Agency consultation status

Agency or entity	Scope of consultation (permit or review)	Status as of September 10, 2026
DPU Division of Public Participation (DPP) and EEA Office of Environmental Justice and Equity (OEJE)	Pre-filing consultation and engagement review, 980 CMR 16.04(1)(b); Status Checklist review; Community Benefits Plan standards	Engaged. Kickoff April 9, follow-up July 20, Status Checklist filed July 28, DPP follow-up August 26, interagency consultation September 4. Updated Status Checklist and this appendix submitted with this filing.
DPU Siting Division (Energy Facilities Siting Board staff)	Consolidated Permit, 980 CMR 13.00; the Board's finding of general consistency with state environmental policies; Pre-filing Notice and Application	Attended September 4, 2026 (A. Greene, Director; W. Wang, Assistant Director; presiding officers; project managers). Staff asked about a more direct gen-tie route across the same landowner's parcel to the south, and

Agency or entity	Scope of consultation (permit or review)	Status as of September 10, 2026
		ISO-NE interconnection cost risk. Answers: Table A3.1.
Energy Facilities Siting Board (EFSB)	Consolidated Permit for a Large Clean Energy Storage Facility, M.G.L. c. 164 §§ 69T to 69V. Includes the Cumulative Impact Analysis and Site Suitability Report.	Pre-filing Outreach Period underway since April 9, 2026. Nothing filed with the Board. Pre-filing Notice planned December 2026. Application February to March 2027.
EFSB (zoning exemption under M.G.L. c. 40A, § 3 within the Consolidated Permit, 980 CMR 13.04)	Exemption from the Charlton bylaw limiting battery storage in Agricultural districts to 5 MW.	The Application will set out the mechanism.
New England Power Company (National Grid), transmission easement holder	Easement consent. The lease area, driveway, and interconnection route partly overlap the easement, whose terms restrict structures and grade changes. The current and September 4 alternative gen-tie routes need consent.	Not yet engaged; not relevant at this stage.
EEA MEPA Office	Consultation required by 980 CMR 16.04(1)(e); MEPA applicability under M.G.L. c. 30 § 62A as amended in 2024; recommendations on studies and additional agencies to consult	Consulted September 4, 2026 (T. Kim, Director; J. Hughes, Deputy Director). It does not expect the Project alone to trigger MEPA review; no state-action nexus is identified. We have requested its position in writing. Recommendations and responses: Table A3.1.
MassDEP, Central Regional Office	Wetlands Protection Act (310 CMR 10.00); 401 Water Quality Certification only if fill over 5,000 square feet or dredging occurs; stormwater; air; waste; wellhead protection; noise	Consulted September 4, 2026 (J. Lyons; J. Schmitz). No filing made. MassDEP recommended filing the formal wetland delineation during design. It asked about future battery replacement area, fire-lane access for wildfire response, and a stray floodplain line. Responses: Table A3.1.
MassWildlife, Division of Fisheries and Wildlife, Natural Heritage and Endangered Species Program (NHESP)	MESA project review, M.G.L. c. 131A; 321 CMR 10.00. Rare species information requires NHESP written approval.	Consulted September 4, 2026 (L. Glorioso). NHESP confirmed mapped Priority Habitat overlaps the gen-tie right of way. It asked for a formal rare species information request, signed by the landowner or lessee. No MESA filing yet; we are preparing the request for signature.
Massachusetts Historical Commission	Historic and archaeological review, M.G.L. c. 9 §§ 26 to 27C; Project Notification Form; possible Phase I archaeological survey	Not yet consulted. Planned September to October 2026. DPP noted September 4 that MHC review uses hard-copy submission.
Massachusetts Commission on Indian Affairs	Guidance on the protocol for tribal consultation with the Chaubunagungamaug Nipmuck Indian Council and the Nipmuc Nation Hassanamisco Council	We wrote to the Director on August 10, 2026 and are following up; no reply yet. DPP asked about this September 4 (Table A3.1).
MassDOT District 3	Access and roadway permits under M.G.L. c. 81 § 21 if a state-layout roadway is affected; oversize and overweight delivery permits	Not yet consulted. Planned September to October 2026.

Agency or entity	Scope of consultation (permit or review)	Status as of September 10, 2026
Department of Conservation and Recreation (DCR)	Forest Cutting Practices Act, M.G.L. c. 132. Our working read: clearing for a permitted change of land use is exempt from a forest cutting plan. To confirm with DCR.	Not yet consulted. Planned September to October 2026.
EPA Region 1, U.S. Army Corps of Engineers, and other federal reviews	NPDES Construction General Permit (disturbance over one acre). Clean Water Act § 404 only if federal waters are affected. FAA obstruction evaluation, if applicable. Not consolidated into the state proceeding.	Not yet consulted. Planned September to October 2026.
MassDOT / MBTA (A. Frazier, access-permit contact)	Named on DPP's September 4 invitation as contact for a MassDOT-related access permit. Scope to be confirmed. MassDOT District 3 is listed separately.	Invited; took no part in the discussion. We will contact Ms. Frazier to confirm the permit and review path.
Central Massachusetts Regional Planning Commission (CMRPC)	Regional planning officials, a Key Stakeholder category under 980 CMR 16.02	Staff briefing August 25, 2026 (Zoom) with R. Barron, Director of Land Use and Zoning. We engage Charlton's three CMRPC commissioners through their municipal roles.
Charlton Select Board	Municipal governance, community priorities, Community Benefits Plan discussions.	Project introduced April 14, 2026. No further session with the Board as a body.
Charlton Planning Board	Land use and site context. Site plan review, which the Board issues in the Town's place under 980 CMR 13.00.	Met June 3, 2026. A member attended the August 4 committee meeting. Bill Fontaine's August 27 email recommending more community engagement, and our August 31 reply, are in Sections A3 and A4.
Charlton Town Administrator and department heads	Municipal coordination. Pre-development staff briefing the Town Administrator recommended June 4.	Met Town Administrator A. Golas June 4, 2026. Briefed department directors July 8.
Charlton Fire Department (Fire Chief)	Fire code review as authority having jurisdiction. Emergency Action Plan under NFPA 855. Firefighting water supply.	Engaged. Representatives attended the June 3 committee meeting. Introductory meeting August 4, 2026. Emergency Action Plan in progress. The Town will select an independent reviewer, paid for by the project.
Charlton Conservation Commission	Order of Conditions under the Wetlands Protection Act (310 CMR 10.00) and the Charlton wetlands bylaw, including the Abbreviated Notice of Resource Area Delineation; stormwater	Not yet consulted. Planned September to October 2026, before any ANRAD filing. Notice of Intent to follow. MassDEP recommended September 4 filing the formal delineation during design.
Charlton Board of Health	Local health review, as applicable	Not yet consulted. Planned September to October 2026.
Charlton Department of Public Works	Road, driveway, curb cut, and drainage permits, as applicable. Construction truck routing and road protection.	Not yet consulted. Planned September to October 2026. Study status: Section A2.
Charlton Building Commissioner / Inspectional Services	Building and electrical permits, 780 CMR and 527 CMR, issued through the Consolidated Permit	Not yet consulted. Planned September to October 2026.

Appendix A2. Site suitability and cumulative impact (980 CMR 16.04(1)(d)2)

Required: a summary of how the site suitability criteria, the cumulative impact analysis requirements, and the cumulative impact analysis tool are informing Project design and planning. This section is the summary. The analyses are [Attachment B](#) (Site Suitability Analysis) and [Attachment C](#) (Cumulative Impact Analysis), both preliminary. It replaces the July 28 text, withdraws the environmental justice screening language DPP flagged on August 17, and states the measured Facility Boundary in place of the July 28 acreages.

A2.1 What we ran, and on what geometry

980 CMR 15.02 and 15.05(1)(a) define the Facility Boundary as the outer boundary of the site or fence line and, for linear parts, the edge of the right of way. Measured from site plan G101 revision 16 (June 10, 2026), it is 17.29 acres as one polygon, on and next to parcel 43-A-1 at 131 Carpenter Hill Road (47.13 acres). About 1,142 feet of the gen-tie easement runs off the parcel. We are reconciling the title block's 1.57-acre easement and 16.57-acre total with the engineer. This corrects the July 28 description of a six-acre footprint in a fifteen-acre area; a vegetated-area figure in that version had no source and is withdrawn. Nothing in the record designates any part of the parcel outside the Facility Boundary for a particular use. Parts of the lease area, the driveway, and the interconnection route sit in a New England Power Company easement whose terms restrict structures and grade changes; the easement holder's consent is required ([Section A1.3](#)).

Table A2.1. Facility Boundary components, site plan G101 revision 16

Component	Dimensions	Area	Notes
BESS project area	Leased work area: fenced equipment pad (136 Tesla Megapack 3 units, 26-foot fire lane around the equipment, 50 feet from equipment to fence) plus construction work limits. Fenced area about 5 acres or less.	15.26 acres	Published commitment: total parcel disturbance at or under 10 acres.
Gen-tie easement	2,694 by 30 feet; overhead to underground at the road	1.86 acres	About 1,142 feet lie outside parcel 43-A-1. Point of interconnection: Carpenter Hill substation (42.129251, -71.997045).
Access driveway	About 951 by 26 feet from Carpenter Hill Road	0.55 acre	
Facility Boundary, total		17.29 acres	One merged polygon; components overlap where they meet, so the three areas above exceed the total. We are reconciling title block figures with the project engineer.

Three analyses use this geometry. We ran the Site Suitability Mapping Tool on July 17, 2026 on a 5.7-acre area and will re-run it on the 17.29-acre Facility Boundary before the Pre-filing Notice. We measured the one-mile Specific Geographical Area for MassEnviroScreen from the Facility Boundary in September. We completed a terrain, soils, drainage, and well screen on published mapping and LiDAR on September 3. All three went to the agencies September 4.

A2.2 Results: anticipated scores and the Burdened Area

The project is a Large Clean Energy Storage Facility, so the Site Suitability Guidance applies (980 CMR 15.10(1)) and we must share anticipated Criteria-specific Suitability Scores during pre-filing (15.10(2)). Every score below is provisional until the Site Suitability Report is filed under 15.10(3). [Exhibit B](#) explains each criterion and what the desktop screening found beyond the six.

Table A2.2. Anticipated Criteria-specific Suitability Scores, July 17, 2026 run on 5.7 acres (provisional; 0.0 most suitable, 5.0 least)

Criterion	Provisional score	Basis	Expected effect of the re-run on the 17.29-acre Facility Boundary
Social and environmental burdens	4.0 of 5	Host block group MassEnviroScreen score 80.9, in the tool's greater than 70 to 90 percent band.	None. The score does not move with boundary or design.
Carbon sequestration and storage	3.7 of 5	Mean of all Ecosystem Carbon Index values in the scored area.	Expected to move. The re-run adds about 11.6 acres over the July 17 run, including the 1.86-acre gen-tie easement and 0.55-acre driveway, mostly forested.
Biodiversity	2.9 of 5	Mean of top-quarter Biodiversity Index values in the scored area.	Expected to move, same reason. Published NHESP and BioMap layers show Rare Species Core 869 and Priority Habitat PH 865 within about a foot of the Facility Boundary, not overlapping it.
Agricultural resources	0.0 of 5	Mean of top-half Agricultural Resource Index values; no prime farmland soil in the 5.7-acre area.	We will re-run, not assume. The Facility Boundary clips about 0.009 acre of prime soil unit 305B where the gen-tie easement meets the road.
Climate change resilience	Not scored	The July 17 tool report gave no score. FEMA places the whole site in Zone X, minimal flood hazard (FIRM panel 25027C0788F, effective June 21, 2023).	Our September 4, 2026 Climate Resilience Design Standards Tool run, presented to the agencies: no coastal exposure; High Exposure for extreme precipitation and extreme heat. See Section A2.3 .
Protected open space	No overlap	The tool report finds no overlap. The Facility Boundary comes within 373 feet of Protected Open Space.	No automatic 5.0 applies on any criterion.

The site is not a brownfield, landfill, or previously developed land. The Social and Environmental Burdens score is a lookup from the block group's MassEnviroScreen score and cannot change with design.

The Cumulative Impact Analysis and the Burdened Areas determination use MassEnviroScreen under 980 CMR 15.00. A Clean Energy Storage Facility carries a one-mile Specific Geographical Area (15.05(1)(b)). Block group 250277561012 contains the whole Facility Boundary and scores 80.9 against the 75 threshold in 15.04(1)(a), so it is a Burdened Area. It qualifies on score, not income (median household income about 82 percent of the state median, against the 65 percent trigger). We checked every parcel hosting a component, as 980 CMR 16.06(1)(a)10 requires; all fall in this block group. The CIA therefore continues under 15.05(3) and 15.06. The map required by 16.06(1)(a)9 is in [Exhibit C](#) and the September 4 deck.

Table A2.3. Block groups within one mile of the Facility Boundary (MassEnviroScreen, February 27, 2026 build)

Block group	MES score	Burdened Area	Position and status
250277561012	80.9	Yes	Contains the entire Facility Boundary, including the off-parcel gen-tie easement. About 1,451 acres of the block group lie inside the one-mile area.
250277561013	73.0	No	Inside the one-mile area, about 0.34 mile from the Facility Boundary at its nearest point, about two points under the threshold. We include it in the Cumulative Impact Analysis voluntarily.
250277561022	10.6	No	Inside the one-mile area, about 0.30 mile from the Facility Boundary at its nearest point.

What drives the 80.9. The environmental effects component scores 86.0, the 99.7th percentile of 5,109 Massachusetts block groups; pollution exposure scores 23.3, the 15.5th percentile. Pollution cleanup sites, groundwater threats, solid waste sites, impaired water bodies, and hazardous waste generators all sit above the 80th percentile; adult cancer, adult high blood pressure, and premature mortality are elevated. Sixteen of the 29 scored indicators are above the 50th percentile and are Elevated Indicators under 980 CMR 15.02. Wildfire risk (77.6) and flood risk (54.3) are the two most closely tied to battery storage. Heavy traffic, nitrogen dioxide, diesel particulate matter, and drinking water non-compliance are not elevated.

[Appendix C](#) carries the full indicator table, the construction and operations assessment of each Elevated Indicator (15.06 and 15.07), the avoidance, minimization, and mitigation measures, and the community input gathered under 15.07(4). Every determination is preliminary and names the study it depends on. On the current record we identify no Disproportionate Adverse Effect in either phase, conditional on those studies. The CIA Report is filed with the Application; we share results with Key Stakeholders during pre-filing under 15.03(6).

A2.3 How the criteria and the analysis shape the design

Avoid first, then minimize, then mitigate. Each feature below is the current design; final engineering sets the details, and permit conditions make the outcomes binding. Findings are desktop findings on published mapping and LiDAR, not survey.

Table A2.4. Criteria and indicators

Criterion or indicator	What the analysis found	Current design	Study and timing
Habitat, trees and carbon (Carbon and Biodiversity criteria)	Forest covers 82 percent of the parcel and 99 percent of the leased work area. Published NHESP Priority Habitat and BioMap layers put PH 865 and Rare Species Core 869 at the parcel's northwest edge, within about a foot of the Facility Boundary, not overlapping it. Roughly 678 feet of gen-tie easement lies within five feet of the PH 865 line as drawn, finer than the layer's mapping tolerance.	Published commitment: total parcel disturbance at or under 10 acres. Off-parcel corridor clearing stays inside the 1.86-acre right of way. Current design: the PH 865 boundary as drawn is a no-disturbance line, survey-staked before any clearing, pending NHESP confirmation in the MESA review.	MESA project review with NHESP not yet filed. Limit of work on the plans filed with the Application. Seasonal clearing windows to confirm with NHESP. No rare species information without NHESP written approval (M.G.L. c. 66, § 17D).

Criterion or indicator	What the analysis found	Current design	Study and timing
Wetlands and water (Biodiversity criterion; impaired waters and groundwater threats indicators)	No direct wetland fill. New impervious surface on pad and driveway. About 0.05 acre of the 100-foot wetland buffer zone at the work area's southern corner. MassDEP maps no wetland on the parcel; the National Wetlands Inventory maps 0.46 acre of forested wetland on the parcel, outside the work area.	Setbacks from delineated resource areas; no net runoff increase; roughly 46 acres of hillside run-on diverted around any containment; secondary containment for transformer oil.	ANRAD once the field delineation is confirmed; Notice of Intent follows. Stormwater design in progress. Field wetland delineation status: studies table, Section A2.4 .
Drainage and run-on (impaired waters indicator)	The pad drains south to a wetland about 300 feet away; Cady Brook is in a different drainage. About 46 acres of hillside drain onto the pad.	Run-on diverted around any containment; no net runoff increase; firewater captured on an impermeable surface.	Stormwater design in progress, to the Climate Resilience Design Standards Tool 2070 design storm or a documented departure, as the MEPA Office asked September 4. The September 4 materials put the run-on question to MassDEP.
Soils and groundwater (groundwater threats indicator)	Ridgebury soil under 76 percent of the pad: poorly drained, seasonal water table within inches of the surface, over dense till.	Foundation, dewatering and recharge design follow the borings.	Geotechnical borings, test pits and piezometers, September 2026. Door-to-door well survey within half a mile not started.
Private wells (groundwater threats indicator)	The topographic flow-routing screen puts two mapped wells within a mile downgradient of the pad; sixteen well records cannot be placed. It follows land surface, not a hydrogeologic model; the wells run 175 to 665 feet deep in fractured bedrock. We do not state whether any well is affected.	Secondary containment for transformer oil; dewatering and recharge design follow the borings.	Door-to-door well survey within half a mile not started. Geotechnical borings September 2026. Groundwater questions carried into the MassDEP consultation.
Slope (Board's draft Baseline Standards)	About 0.11 acre of the pad is at or above the 27 percent limit in the Board's draft Baseline Standards revised August 21, 2026, which leave the term site footprint undefined. Pad slope averages 9.7 percent on a 5-metre grid and 11.6 percent on a 1-metre grid.	Grading design follows the borings and stormwater design.	With the stormwater design, in progress. Comments on the Board's revised draft standards due September 11, 2026.
Fire safety (wildfire risk indicator, 77.6th percentile)	Thermal runaway is the credible event for lithium-ion storage. Host block group wildfire risk: 77.6th percentile.	The UL 9540A test method applies to units of this type; the manufacturer states the unit is designed to meet and exceed it. NFPA 855 separation, 26-foot fire lane, 50 feet from equipment to fence, firewater capture with testing.	Unit-specific test report and hazard mitigation analysis with the Application. Emergency Action Plan (independently reviewed) and fire water source decision, both with the Charlton Fire Department, in progress. Smoke and toxic gas plume

Criterion or indicator	What the analysis found	Current design	Study and timing
			dispersion analysis not started.
Flood and climate (flood risk indicator, 54.3; Climate Change Resilience criterion)	FEMA places the whole site in Zone X. Our September 4, 2026 Climate Resilience Design Standards Tool run, presented to the agencies, rates the site High Exposure for extreme precipitation (10.7-inch, 24-hour, 100-year storm by 2070) and extreme heat (up to 59 days a year above 90°F by 2070).	Siting in Zone X. Projected precipitation and heat figures feed the stormwater design and equipment thermal specification.	Stormwater design in progress.
Noise, visual, traffic	Inverter and cooling fan noise, no combustion. Cabinets under 10 feet tall. Truck deliveries during construction.	Setbacks per site plan G101 revision 16. Screening we install and maintain appears on the landscaping plan filed with the Application. We work out truck routing and road protection with the Town.	Sound study against the MassDEP noise policy and viewshed or visual impact assessment: status in the studies table, Section A2.4 . Landscaping and lighting plans, magnetic field analysis, and traffic plan with Charlton DPW not started.
Site selection and alternatives (980 CMR 16.06(1)(a)6)	We chose the site for adjacency to the Carpenter Hill substation, where the 345 kV line built in 1967 meets the region's 115 kV lines; a gen-tie of about 2,694 feet, not new transmission, interconnects the facility. Siting Division staff asked September 4 whether we considered a more direct gen-tie route south across the same landowner's land. The MEPA Office recommended an environmental alternatives analysis of siting and design alternatives that reduce footprint and clearing.	Layout cut from 156 to 136 Tesla Megapack 3 units (site plan G101 revision 16). Both gen-tie routes cross utility easements needing the same third-party consent; the current route clears less and keeps the landowner's view.	Environmental alternatives analysis scoped for the Application; approach shared with the MEPA Office. Battery technology alternatives already considered.
Cumulative burden (Social and Environmental Burdens criterion, 4.0)	The block group fixes the 4.0 score; design does not move it.	The Community Benefits Plan, drafted with the Citizen Advisory Committee since June 2026, turns residents' priorities into measurable commitments. Permit-required mitigation is listed separately, not counted as a benefit.	Cumulative Impact Analysis Report in preparation. Draft Community Benefits Plan to the Citizen Advisory Committee September 10, 2026; public comment October through November 30, 2026.

A2.4 Studies complete, in progress, and not started**Table A2.5. Project-specific studies as of September 10, 2026 (980 CMR 16.04(1)(f))**

Status	Study or analysis	Timing
Complete	Critical Issues Analysis (Stantec, November 2023)	Complete
Complete	Site Suitability Mapping Tool run, July 17, 2026, 5.7-acre site area	Re-run on the 17.29-acre Facility Boundary before the Pre-filing Notice, December 2026
Complete	MassEnviroScreen block group analysis (February 27, 2026 build)	Complete; carried into the CIA Report
Complete	One-mile landmark map, two sheets	Complete; posted on the project website
Complete	Terrain, soils and drainage analysis	Complete, September 3, 2026
Complete	Well gradient screen and well inventory within one mile	Complete, September 3, 2026
Complete	Wellhead protection desktop screen and ACEC check	Complete, September 2, 2026
Complete	Climate Resilience Design Standards Tool run, September 4, 2026	Complete. On September 4 the MEPA Office asked us to design stormwater to the tool's 2070 100-year, 24-hour storm (10.7 inches) or document the departure; carried into the stormwater design
In progress	Cumulative Impact Analysis Report	Filed with the Application; results shared with Key Stakeholders during pre-filing
In progress	Stormwater design	In progress
In progress	Emergency Action Plan with the Charlton Fire Department, independently reviewed	In progress. On September 4, 2026 MassDEP asked whether the fire lane gives apparatus enough access to keep a fire from spreading into the surrounding woods; addressed here and in the fire protection engineering report.
In progress	Fire water source decision with the Charlton Fire Department	In progress
In progress	Viewshed or visual impact assessment (preliminary viewshed analysis complete; full assessment with the landscaping plan)	Preliminary analysis complete; full assessment filed with the Application
In progress	Sound study against the MassDEP noise policy	Initial screening study drafted (Rev 1, September 6, 2026), under internal review. The full study against the MassDEP noise policy follows; results published on the project website and filed with the Application.
Not started, or open	Environmental alternatives analysis: siting and design alternatives that reduce footprint and clearing (MEPA Office recommendation, September 4, 2026, beyond the battery technology alternatives already considered)	Scoped for the Application; approach shared with the MEPA Office
Not started, or open	Statement on whether future battery replacement or expansion needs a separate area (MassDEP ask, September 4, 2026)	With the project description in the Pre-filing Notice, December 2026

Status	Study or analysis	Timing
Not started, or open	Field wetland delineation (a wetlands specialist has made a field visit; formal delineation not yet done)	On September 4, 2026 MassDEP recommended filing the formal delineation during design. We complete the field delineation this fall and file with the Charlton Conservation Commission (ANRAD, Notice of Intent to follow), confirming the filing route with MassDEP and the Commission.
Not started, or open	Traffic plan with Charlton DPW	Not yet started
Not started, or open	MESA project review with NHESP	Not yet filed. On September 4, 2026 NHESP asked for a formal rare species information request, signed by the landowner or lessee, as the first step; we are preparing it for signature.
Not started, or open	Geotechnical borings, test pits and piezometers	September 2026
Not started, or open	Door-to-door well survey within half a mile	Not yet started
Not started, or open	Fire protection engineering report and hazard mitigation analysis	With the Application
Not started, or open	Fire smoke and toxic gas plume dispersion analysis	Not yet started
Not started, or open	SF6 determination; SPCC Plan and Licensed Site Professional	Not yet started
Not started, or open	Massachusetts Historical Commission Project Notification Form; tribal consultation (August 10, 2026 letter to the Director of the Massachusetts Commission on Indian Affairs recorded in Section A1)	Not yet started
Not started, or open	Landscaping and lighting plans; magnetic field analysis	Not yet started
Not started, or open	FAA obstruction evaluation; Clean Water Act Section 404 applicability	Not yet started
Not started, or open	Decommissioning and site restoration plan with a cost estimate by a Massachusetts-licensed Professional Engineer (980 CMR 1.10); financial assurance in place before construction	With the Application

MEPA Office staff said on September 4 that an ENF or EIR is likely not required for a facility the Board permits. Our read is that M.G.L. c. 30, § 62A, as amended by c. 239 of the Acts of 2024, § 33, exempts a Consolidated Permit applicant, and we have asked the Office to confirm in writing. The Board's rules call for a finding of general consistency with state environmental policies, including the GHG Policy and the climate resiliency policy, which the Application addresses. We add any study an agency recommends to this table and report it in the Completion Checklist.

A2.5 Sharing

The anticipated scores and the Burdened Area finding went to the agencies September 4 and to the Citizen Advisory Committee September 10 ([AppendixB and C](#)). They go to the public September 16 and onto the website, with the re-run results when available. The scores had not gone to the committee before September 4.

Appendix A3. Improvements proposed by Local Government and state agencies (980 CMR 16.04(1)(d)3)

Required: a summary of related improvements proposed by Local Government or state agencies during Agency Consultation. Agency Consultation (980 CMR 16.02) covers written, oral, and other communications with Local Government and state agencies with an interest in permitting the facility; we include DPP and OEJE consultations under 16.05 so every proposal is in one place. [Table A3.1](#) lists each proposal in date order with our response and its effect on the design, the study program, or the engagement program. [Table A3.2](#) gives our status against 980 CMR 16.06(1)(a) items 1 to 12, which the agencies asked for September 4. For DPP's August 17 items on the form itself, see [the cover letter](#). September 4 rows come from our notes of the call ([Section A5](#), item 2); we add any later written request here and in Section A4.

A3.1 Proposals and requests, our response, and effect

Table A3.1. Proposals and requests from Local Government, DPP, and state agencies, April 9 to September 10, 2026

Date and body	Proposal or request	Applicant response	Effect
DPP and OEJE, April 9, 2026 (kickoff)	Cap clearing. Disclose the develop-and-sell model. Produce a one-mile landmark map. Add sessions beyond the two required. Talk with abutters alongside agency meetings.	Disturbance capped at 10 acres (Commitment Tracker). Transfer model disclosed July 8 and online. Landmark map published (Revision 1, August 4). Third public meeting (November), committee, and webinar added. Door-knocking April 14 to 15; Kitchen Table Talks (September 5) postponed, being rescheduled.	Design bound; engagement change.
Select Board member, April 14, 2026	The website still listed the Sturbridge Road project.	Corrected; Sturbridge Road is not proceeding now.	Website change.
L. Degnan, Planning Board alternate, April 14, 2026 (as an individual)	A Charlton-specific benefits scorecard. Concern over clearing, topsoil, and cumulative burden. An opt-out for towns producing more than their share.	Plan and scorecard co-created with the Citizen Advisory Committee (formed June 3); the Commitment Tracker is the scorecard. Disturbance capped at 10 acres. Burden: Section A2.2 . Opt-out: Section A4.	Committee formed; clearing cap published.
Charlton Planning Board, June 3, 2026	More notice before the first public meeting. Use schools, sports families, businesses, realtors, a town-wide mailing, the newspaper, and TV Charlton.	July 8 kept; notice record in Attachment A . Second committee meeting moved to August 4. Channels raised again by Bill Fontaine August 27 (below).	Committee meeting moved; September 30 notice expanded.
Charlton Planning Board, June 3, 2026	Fire session in person, not a webinar. A session on Charlton's electricity use. Return to the Board July 8 or 15.	Webinar held August 19 (two recorded sessions), none in person. Electricity question answered July 8. No return visit; directors briefed July 8; a Board member joined August 4.	Partly adopted.
Charlton Planning Board, June 3, 2026 (board and public questions)	Well and waterway safeguard reports. Thermal runaway, smoke, emergency response. A	Well inventory and gradient screen done September 3; borings and door-to-door survey on the list (Section A2.4). Emergency Action Plan in	Studies in progress.

Date and body	Proposal or request	Applicant response	Effect
	decommissioning bond. Taxation versus PILOT.	development. Decommissioning: Section A2.4 . Comparable PILOT added to the Document Library.	
Town Administrator Andrew Golas, June 4, 2026	Pre-development meeting with department heads. Postcard to every address. Link from the town website.	Directors briefed July 8. About 5,414 postcards mailed; delivery ran late and we dropped the vendor. No town link yet; we will ask.	Briefing held; mailer sent; link pending.
Town Administrator, June 4, 2026	Specific, enforceable benefit commitments (apparatus, payments, capital). Benchmark Massachusetts BESS agreements.	Comparable agreements in the Document Library. Every draft plan item states funding and enforcement. The town and the project decide together what enters a signed agreement. Draft to the committee September 10.	Shapes the Community Benefits Plan.
Town Administrator, June 4, 2026	Engage Bay Path and the Dudley-Charlton schools. Treat Senior Center and Fire Department equipment as standing priorities. Separate individual views from board positions. Meet the Building Commissioner.	Bay Path call September 8: credential inventory to be mapped to coursework (Sections A1.1 and A1.2). School district outreach not yet recorded. Senior Center and Fire Department priorities carried in the plan. Statements attributed by role. Building Commissioner: Section A1.3 .	Bay Path pathway begun.
Town department directors, July 8, 2026	Site plan walkthrough and staff questions.	Held at the Town Administrator's recommendation. No specific requests recorded.	No documented request.
DPP, July 13, 2026 (written) and July 20 (consultation with OEJE)	Seven data requests (stakeholder list, agency list, landmark map, feedback summary, abutter counts, CMRPC and Keep Charlton Beautiful status, checklist timeline). Would a CIA and site suitability assessment be done and shared. Website fixes and a 980 CMR 16.09 review.	Answered July 20; documents delivered July 28. Landmark map July 20, Revision 1 August 4. Feedback summary posted. CMRPC briefed August 25; Keep Charlton Beautiful pending. Tool run July 17 and MassEnviroScreen review done (Exhibits B and C). Website fixed; 16.09 audit July 20.	Documents produced; analyses run; website fixed.
Charlton Fire Department, August 4, 2026 (Chief Barton, Inspector Clark, our fire consultant)	Agenda: protection systems, access, hazard mitigation, thermal runaway, shutdown, department role. No specific requests recorded.	Emergency Action Plan under NFPA 855 in development; town-selected independent reviewer at our cost. Water source decision in progress. The Chief and Inspector joined the August 19 webinar; the Chief's comments: Section A4.	Plan and water source in progress.
DPP (P. Dieffenbach), August 17, 2026 (written)	The permit and agency list is ours to identify; report updates.	Section A1.3 is our list. Since July 28: MEPA Office consulted September 4; DCR, Department of Fire Services, and the MassDOT / MBTA contact added; FAA evaluation added to studies; no MESA filing made.	Agency list updated.

Date and body	Proposal or request	Applicant response	Effect
DPP, August 17, 2026	Hold the second public meeting after initial agency consultation.	Set for September 30, 2026 (12:15 to 1:15 and 6:30 to 8:00 PM, Dexter Hall), after the September 4 consultation. Remaining consultations September to October.	Second meeting set for September 30.
Fire Chief Rob Barton, August 19, 2026 webinar	No hydrants; nearest line at Route 169 and Snake Hill Road. The department will retain a consultant for the response plan. A large incident needs mutual aid.	Water source decision in progress. Town-selected independent reviewer at our cost. The plan will include pre-operational and annual training, mutual-aid tours, and tabletop exercises.	Water source decision in progress.
CMRPC, August 25, 2026 (R. Barron and staff)	Introductory briefing at our request. CMRPC is helping member towns prepare for the new process.	Briefed. Charlton's commissioners are engaged through municipal roles. Notes available on request.	No documented request.
Bill Fontaine, Charlton Planning Board, August 27, 2026 (written, copied to town staff and sitingboard.filing@mass.gov)	More meetings for residents unaware of July 8. Two weeks' notice, outside holidays. Reach school families, employers, seniors, youth sports, faith groups, service organizations. Notices arrived late.	Replied August 31: September 30 meeting (midday and evening), Old Home Day September 6, Bay Path meeting, committee September 10, November meeting. Offered mailers for his groups; accepted September 1; stacks handed over September 6 (Section A1.1).	Mailer program; targeted outreach.
DPP, September 1, 2026 (written)	Publicize the September 5, 6, and 10 events; consider open houses and tabling; keep DPP informed.	Replied September 2. Since then: 1,953 mailers (August 31); stacks with the Overlook, Bill Fontaine, and community groups; Kitchen Table Talks postponed; Bay Path call September 8; committee September 10. Planned outreach: Section A1.2 and the cover letter .	Mailer program; community distribution.
Interagency consultation, September 4, 2026 (DPP, Siting Division, MEPA Office, MassDEP, NHESP)	All 980 CMR 16.06(1)(a) items 1 to 12.	Table A3.2 gives each item's status and next step.	Reported in Table A3.2 .
MEPA Office (T. Kim), September 4, 2026	MEPA review is not expected on its own; the Board must find general consistency with state environmental policies.	Consultation held under 980 CMR 16.04(1)(e). Written position requested; general consistency addressed in the Application.	Open: written confirmation.
MassDOT / MBTA (A. Frazier), September 4, 2026	Invitation contact for a MassDOT access permit; did not take part.	We will contact Ms. Frazier to confirm the permit; MassDOT District 3 consulted separately.	Open.
MassDEP Wetlands (J. Schmitz), September 4, 2026	File the formal wetland delineation now, by RDA or NOI.	Accepted. Field delineation filed with the Conservation Commission this fall; route confirmed with MassDEP (Section A2.4).	Study added: delineation filing.

Date and body	Proposal or request	Applicant response	Effect
MassDEP Wetlands, September 4, 2026	401 certification applies only to fill over 5,000 square feet or dredging.	Noted; the permit list states it that way (Table A3.2 , item 2).	Permit list wording.
MassDEP Wetlands, September 4, 2026	State up front any future battery replacement or expansion area.	Accepted. The Pre-filing Notice project description will state it (Section A2.4).	Pre-filing Notice content.
MassDEP Wetlands, September 4, 2026	Does the fire lane give apparatus enough access to keep fire out of the woods?	Carried into the Emergency Action Plan and the fire protection engineering report (Section A2.4).	Carried into fire planning.
MassDEP Wetlands, September 4, 2026	Correct a stray floodplain line on one figure.	Accepted; corrected before reuse. FEMA places the parcel in Zone X.	Figure correction.
MassDEP Water Resources (J. Lyons), September 4, 2026	Energy infrastructure lands in forested, lower-density towns like Charlton to serve demand elsewhere, drawing opposition.	Acknowledged. Site basis restated: the 345 kV line and substation. Carried into the alternatives analysis and September 30.	Noted; alternatives analysis.
MEPA Office, September 4, 2026	Prepare an environmental alternatives analysis (siting and design options that reduce clearing).	Accepted; added to the study program; scope to be shared with the Office.	Study added.
MEPA Office, September 4, 2026	Be ready to justify the site given the cumulative score.	Exhibits B and C carry the justification; tool re-run before the Pre-filing Notice.	Exhibits B and C .
MEPA Office, September 4, 2026	Consider carbon mitigation for clearing (conservation restriction, tree planting) though under the 50-acre threshold.	Accepted for evaluation; replanting committed July 8; form settled through the plan and the Application.	Under evaluation.
MEPA Office, September 4, 2026	Use the Climate Resilience Design Standards Tool's 2070 storm (10.7 inches, 24 hours) for stormwater, or document why not.	Accepted. Tool run September 4; the stormwater design uses it or documents the departure.	Design input: stormwater.
MEPA Office, September 4, 2026	A fire discharging to surface water could be raised as an environmental justice concern; review prior Board cases.	Accepted. Current design captures firefighting water on an impermeable surface; prior decisions under review.	Design; record review.
NHESP (L. Glorioso), September 4, 2026	Priority Habitat overlaps the gen-tie right of way; submit a signed rare species information request.	Accepted; we are preparing it for signature (Section A2.4).	Study added: NHESP request.
Siting Division staff, September 4, 2026	Was a more direct gen-tie route across the landowner's land considered?	Answered: both routes need the same easement-holder consent; the current route clears less and preserves the landowner's view. Recorded in the alternatives analysis.	Answered.

Date and body	Proposal or request	Applicant response	Effect
Siting Division staff, September 4, 2026	Do ISO-NE cost increases concern the project?	Answered: our analysis supports proceeding; cost is a tracked risk. Queue re-entry planned for fall 2026.	Answered; no change.
DPP, September 4, 2026	Have we reached the tribal councils through the Commission on Indian Affairs? MHC review is hard copy only.	Letter to the Commission August 10; no reply; following up. MHC form filed in hard copy (Section A2.4).	Open follow-up.
DPP, September 4, 2026	Send the presentation to every invited contact.	Sent with the follow-up packet.	Done.

A3.2 Status against 980 CMR 16.06(1)(a) items 1 to 12

We cite slides by heading from the corrected export of the September 4 deck ([Section A5](#)). Where a slide does not carry an item in full, our meeting notes are the record.

Table A3.2. 980 CMR 16.06(1)(a) items: where provided September 4, 2026, and status

Item	Requirement (short)	Where it was provided on September 4	Status and next step
(a)1	Basic Project details, proposed work activities, and potential Project impacts on the Community.	'The applicant, and who signs' (applicant, authorized representative, 150 MW / 600 MWh, 136 Tesla Megapack 3 units, site control); 'What is being proposed'; 'The Facility Boundary measures 17.29 acres' (components and title-block reconciliation in Section A2); 'Anticipated impacts, and what the current design does'.	Provided. One-page project description and site plan G101 revision 16 in the follow-up packet (Table A3.1). Final plans with the Application.
(a)2	List all Local Government, state, and federal Permits anticipated, per 980 CMR 13.05(1).	'The approvals we expect to need'; 'How the Consolidated Permit folds in every other permit'; 'What we want to confirm with each of you today'. Corrected permit matrix in the follow-up packet.	Provided as our read; the definitive list follows the consultations. Changes since July 28: Section A1. Consultations planned September to October 2026 with the Massachusetts Historical Commission, MassDOT District 3, DCR, the Department of Fire Services, and EPA Region 1 with the Army Corps.
(a)3	If available, copies of draft applications for applicable state, regional, and local Permits.	The note on 'Where we are in the pre-filing period': no draft application or draft permit in circulable form; both go to every relevant agency with the Pre-filing Notice.	Open by design. Draft applications go to every relevant agency with the Pre-filing Notice, December 2026 (980 CMR 16.10(2)). Agencies have 30 days to comment; we may respond within seven days (980 CMR 16.10(4)(b)).
(a)4	If available, copies of draft Permits with recommended conditions.	The same note, 'Where we are in the pre-filing period'.	Open by design. Same schedule as item 3.
(a)5	Discuss with the MEPA Office the need for meetings	The MEPA Office card and the 'Not on this call today' card on 'What we want	Discussed September 4. The MEPA Office named no additional state or

Item	Requirement (short)	Where it was provided on September 4	Status and next step
	with additional state or federal agencies.	to confirm with each of you today': Massachusetts Historical Commission (with tribal consultation), MassDOT District 3, DCR, Department of Fire Services, EPA Region 1 with the Army Corps.	federal agencies beyond Section A1.3 . DPP asked us to confirm outreach to the regional tribal councils through the Massachusetts Commission on Indian Affairs (follow-up under way) and noted that Massachusetts Historical Commission review proceeds by hard copy. We plan separate consultations with MHC, MassDOT District 3, DCR, the Department of Fire Services, and EPA Region 1 for September to October 2026. September 4 agency-specific requests: Table A3.1 .
(a)6	Site selection process, alternate designs considered, locus maps, and environmental resource constraints (Article 97, wetlands, Chapter 91, rare species habitat, ACECs).	'Why this site'; 'Six constraints, in the maps that show them'; 'The Facility Boundary measures 17.29 acres'. Critical Issues Analysis listed complete on 'Studies done, in progress, and not yet started'. Site selection summary and earlier 156-unit layout: Section A2 and Table A3.1 .	Provided. Desktop screen: no Article 97 land, no M.G.L. c. 91 jurisdiction, no ACEC within 16 miles (Section A2). Wetland delineation status: Section A2. ANRAD follows confirmation of the field delineation; Notice of Intent follows. On September 4 MassDEP asked us to file the formal delineation during design; NHESP asked for a formal rare species information request (Table A3.1).
(a)7	Route and site selection for LCTDIFs, SCTDIFs, and transmission Facilities.	Not on a slide. Our reading: here and in Section A2.	Not applicable in our reading: the Project is an LCESF and the gen-tie is a component inside the Facility Boundary, covered under item 6. We will confirm this with DPP in writing.
(a)8	How site suitability criteria, CIA requirements, and the CIA tool under 980 CMR 15.00 were incorporated into site selection.	'Anticipated site suitability scores, and a correction' (July 17 tool run on a 5.7-acre footprint: burdens 4.0, carbon 3.7, biodiversity 2.9, agricultural 0.0; climate resilience not scored; no protected open space overlap); 'The site sits inside a Burdened Area'; 'Anticipated impacts, and what the current design does' (disturbance at or under 10 acres, setbacks from delineated resource areas, no net runoff increase, NFPA 855 separation, firewater capture).	Provided as provisional under 980 CMR 15.10(2). We re-run the tool on the 17.29-acre Facility Boundary before the Pre-filing Notice. Anticipated scores go to the Citizen Advisory Committee September 10, 2026, to the public at the September 30 meeting, and onto the project website. The MEPA Office noted September 4 that we should be ready to justify the site's suitability given the score (Table A3.1).
(a)9	Identify Burdened Areas using the Burdened Areas Map under 980 CMR 15.04, with a map of the Project location and proximity.	'The site sits inside a Burdened Area': census block group 250277561012 scores 80.9 on MassEnviroScreen against the 75 threshold in 980 CMR 15.04(1)(a); map of the block group and Project location.	Provided. Site inside a Burdened Area; full Cumulative Impact Analysis required and in preparation (Section A2).
(a)10	Identify Burdened Areas touching any parcel hosting	'The site sits inside a Burdened Area' with 'The Facility Boundary measures 17.29 acres': we checked every parcel	Provided. Carried into the CIA Report.

Item	Requirement (short)	Where it was provided on September 4	Status and next step
	a portion of the Project, per 980 CMR 15.05.	hosting a component, including the roughly 1,142 feet of gen-tie easement outside parcel 43-A-1; all fall in the same block group. Adjacent block group 250277561013 (score 73.0), inside the one-mile area, is in the Cumulative Impact Analysis voluntarily.	
(a)11	Preliminary environmental impacts and potential avoidance, minimization, and mitigation. No rare species information without NHESP written approval.	'Six constraints, in the maps that show them'; 'What a closer look at the site found' (soils, drainage, the wetland buffer zone, the well screen); 'Anticipated impacts, and what the current design does'; 'Studies done, in progress, and not yet started'. The NHESP card on 'What we want to confirm with each of you today': no rare species information until NHESP approves in writing (M.G.L. c. 66, § 17D).	Provided as desktop findings. Geotechnical borings, plume dispersion analysis, and a door-to-door well survey within half a mile are on the study list; wetland delineation and sound study status: Section A2. We asked agencies to add to the list. September 4: the MEPA Office recommended an environmental alternatives analysis and carbon mitigation for clearing; MassDEP raised fire-lane access and any future replacement area (Table A3.1).
(a)12	Decommissioning and site restoration plans under 980 CMR 1.10.	'Decommissioning and site restoration': financial assurance before construction, Professional Engineer cost estimate, all equipment removed, battery materials recycled, restoration to a standard set with the Town and regulators.	Provided in summary. Decommissioning plan filed with the Application under 980 CMR 1.10 (Section A2.4).

Appendix A4. Comments received (980 CMR 16.04(1)(d)4)

Required: a table of oral and written comments received, all issues raised at Key Stakeholder, Agency Consultation, and Community meetings, and any design modifications made in response. [Table A4.1](#) lists every comment in date order. Type marks the source. The issue is in the commenter's terms; the response says how we considered it and what changed. Agency requests recorded in full in [Table A3.1](#) appear here as one line each. Residents appear by initials or as 'a resident'. Where a study is still open the row points to [Section A2.4](#). We withdrew a vegetated-area figure with no source from three July 28 rows, and added rows July 28 omitted: the May 18 Town Meeting table, the June 3 committee and Planning Board discussions, the June 4 Town Administrator meeting, and a June 24 call from a municipal official.

A4.1 Comments received, April 9 to September 10, 2026

Table A4.1. Oral and written comments, in date order

Source and date	Type	Issue raised	How considered, response, or design modification
DPP and OEJE, Apr 9, 2026	DPP and OEJE	Website accessibility: accordions and the EN/ES/PT switcher did not work.	Fixed and tested before later engagements.
DPP and OEJE, Apr 9, 2026	DPP and OEJE	Fire risk needs dedicated time, not one topic among many.	Two-session fire safety webinar August 19; recordings posted August 31.
Select Board, Apr 14, 2026 (L. Degnan, from the audience)	Local Government	Cumulative burden: past clearing, topsoil removal, and existing energy facilities already burden the town.	Acknowledged. Disturbance capped at 10 acres (published). The block group is a Burdened Area (MassEnviroScreen 80.9); the Cumulative Impact Analysis is Exhibit C .
Select Board, Apr 14, 2026 (L. Degnan)	Local Government	Democratic legitimacy: state override of local zoning; wanted an opt-out for towns producing more than their share.	Acknowledged. Community input shapes how the project is built and the Community Benefits Plan. An opt-out is a matter of state law; noted for the record.
Select Board, Apr 14, 2026 (L. Degnan)	Local Government	Community benefit agreements are "short money"; wanted a Charlton-specific scorecard, not state defaults.	We committed to co-create a Charlton-specific plan and scorecard with the Citizen Advisory Committee; the public Commitment Tracker is the scorecard. The town and the project decide together what enters a signed agreement.
Select Board, Apr 14, 2026	Local Government	The 2024 Energy Storage Overlay District attempt.	We withdrew the 2024 petition to follow the Planning Board's timeline and the new state rules (980 CMR 16.00), under which the project now proceeds.
Select Board, Apr 14, 2026	Local Government	Where the company is incorporated and based.	Delaware; then headquartered in Maitland, Florida. Applicant Carpenter Hill Power, LLC, developed by ESA Solar. Current address in the cover letter .

Source and date	Type	Issue raised	How considered, response, or design modification
Select Board, Apr 14, 2026	Local Government	Physical scale of the project.	Answered April 14: about 15 acres, 150 MW, enough for 60,000 to 120,000 homes for four hours. Now 150 MW / 600 MWh; fenced area about 5 acres or less; disturbance at or under 10 acres (Section A2.1).
Select Board, Apr 14, 2026	Local Government	The website still listed a Sturbridge Road project.	Clarified we are not pursuing Sturbridge now; website corrected.
Annual Town Meeting table, May 18, 2026	Community	Early questions; interest in joining the committee; the Fire Chief open to joining; Bill Fontaine asked to meet; the landowner will attend meetings.	We answered questions, collected sign-ups, and set the first committee meeting for early June and the Planning Board introduction for June 3.
Citizen Advisory Committee 1, Jun 3, 2026	Community	Cumulative clean energy burden; equitable siting statewide; no local rate savings.	Acknowledged. Fenced area about 5 acres or less; clearing at most 10 of 47 acres. Cumulative burden is assessed in Exhibit C .
Citizen Advisory Committee 1, Jun 3, 2026	Community	Wants a signed, binding agreement that travels with the project, not a plan.	We co-create the plan and scorecard with the committee. The town and the project decide together what enters a signed agreement. Permit conditions and the decommissioning bond run with the project.
Citizen Advisory Committee 1, Jun 3, 2026	Community	Emergency response capability, NFPA 855, thermal runaway protocols.	Fire safety webinar held August 19. Emergency Action Plan under NFPA 855 in progress with Charlton Fire, with an independent reviewer the town selects and we pay for.
Citizen Advisory Committee 1, Jun 3, 2026	Community	Benefit priorities: Senior Center, PILOT, tree mitigation, local labor, post-construction reviews.	Carried into the plan; Senior Center support was the worked example August 4. Second committee meeting moved to August 4 at the Planning Board's request (Table A3.1).
Planning Board, Jun 3, 2026 (public discussion)	Community	Well and waterway contamination; safeguard reports; thermal runaway containment, smoke, emergency response.	Studies post to the Document Library as completed; well work in Section A2.4 . Emergency Action Plan in progress. We corrected a June 3 statement about a direct 345 kV tie-in on June 23 (see resident J. P.). Board requests: Table A3.1 .
Planning Board, Jun 3, 2026 (public discussion)	Local Government	The developer's operating experience and ownership transitions; decommissioning bond; taxation versus PILOT.	A long-term owner-operator builds and runs the facility. UL-certified systems; the decommissioning bond transfers with ownership. Tax research under way will compare negotiated terms with standard assessment.

Source and date	Type	Issue raised	How considered, response, or design modification
Resident J. P., after the Jun 3 Planning Board; answered Jun 23	Community	Accuracy of the interconnection described June 3 (a direct 345 kV tie-in).	Corrected: the facility connects at the Carpenter Hill substation through a gen-tie line; no direct 345 kV connection at the site.
Local Government consultations before Jul 13 (Planning Board, Town Administrator, department directors)	Local Government	Requests from Charlton officials and departments.	Table A3.1 ; changes made in Section A4.2 .
Town Administrator Andrew Golas, Jun 4, 2026	Local Government	Staff briefing, town-wide mailer, town website link, enforceable benefits, Bay Path and school district outreach.	Table A3.1 . Directors briefed July 8; town-wide postcard mailed for July 8.
Resident J. P., answered Jun 23, 2026	Community	Scope and status of the second (Sturbridge Power) project.	Disclosed: next to the substation on Sturbridge Road; 115 kV; 150 MW; on hold. Only Carpenter Hill Power is advancing.
Charlton School Committee member, phone call Jun 24, 2026	Community	Construction and testing impacts; whether the substation could host later expansion or a data center; handling of strong opposition; long-term stewardship.	The substation likely has capacity limits. Construction controls (erosion, stormwater, silt fencing, cover crop) described July 8. Our July 17 answers state this is a standalone storage facility, not a step toward a data center.
Public Meeting 1, Jul 8, 2026	Community	Is it a power plant; does Charlton need more generation.	A battery facility stores and releases electricity; it does not generate. It is grid infrastructure, like a substation.
Public Meeting 1, Jul 8, 2026	Community	Why Charlton, when the town already produces more than it uses.	The site has direct access to regional transmission at the Carpenter Hill substation; storage locates where transmission runs. What Charlton receives is the Community Benefits Plan discussion.
Public Meeting 1, Jul 8, 2026	Community	Who decides; does the town have a say.	The Energy Facilities Siting Board permits under the 2024 Climate Act. Residents shape how it is built and the benefits. Our July 17 answers point to the Intervenor Support Grant Program.
Public Meeting 1, Jul 8, 2026	Community	Fire safety and thermal runaway.	The leading concern. Two-session webinar with our fire consultant August 19, recordings posted August 31. Emergency Action Plan in progress with Charlton Fire.

Source and date	Type	Issue raised	How considered, response, or design modification
Public Meeting 1, Jul 8, 2026	Community	Wells, groundwater, water.	Current design sends runoff away from homes to a southern catchment with no net increase. September 3 site analysis, well inventory, and gradient screen done; borings and door-to-door well survey follow (Section A2.3).
Public Meeting 1, Jul 8, 2026	Community	Operating noise.	Sound study against the MassDEP noise policy committed; status in Section A2.4 . We will publish predicted levels at homes, night conditions, and a contour map.
Public Meeting 1, Jul 8, 2026	Community	Appearance and visual impact.	July 28 vegetated-area figure withdrawn (no source). Setbacks per site plan G101 revision 16; nearest home (the landowner's) about 500 feet from the nearest unit. Landscaping plan and visual assessment: Section A2.4 .
Public Meeting 1, Jul 8, 2026	Community	Construction traffic and roads.	A construction management and traffic plan with the town and DPW, not yet started (Section A2.4). We plan a pre-construction meeting, a hotline, and truck routing agreed with the town.
Public Meeting 1, Jul 8, 2026	Community	Lifespan and decommissioning.	Modules are maintained and replaced over time. The decommissioning plan filed with the Application (980 CMR 1.10) sets financial assurance before construction, removal, recycling, and restoration to a standard set with the town.
Public Meeting 1, Jul 8, 2026	Community	What happens when the project changes hands.	We disclosed ESA's develop-and-sell model. Permit conditions and the bond run with the project to any owner.
Public Meeting 1, Jul 8, 2026	Community	Taxes and cost to the town.	Tax research under way, to be published. Payment terms are a plan topic. Comparable agreements, including the executed Carver PILOT, are in the Document Library.
Public Meeting 1, Jul 8, 2026	Community	What Charlton receives.	Benefits are being developed through the plan and the committee. Draft to the committee September 10 and the public September 30; comment through November 30.
Public Meeting 1, Jul 8, 2026	Community	Cheaper or backup power for the town?	No. The facility serves the regional grid. Its stored energy could serve about 120,000 homes for four hours.

Source and date	Type	Issue raised	How considered, response, or design modification
Public Meeting 1, Jul 8, 2026	Community	How to participate and stay informed.	Meetings, the website comment form, the project contact, and the email list. The August 4 committee meeting, August 19 webinar, and September 30 meeting followed.
Public Meeting 1, Jul 8, 2026	Community	Comment cards showed low confidence; trust was the main theme.	July 17: summary, full recording, Q&A, and written answers to every question posted; follow-up sessions added. The three questions listed July 28 as pending are closed (see the September 4 row).
DPP (P. Dieffenbach), written Jul 13; consultation Jul 20, 2026	DPP and OEJE	Seven data requests: stakeholder list, agency list, landmark map, feedback summary, abutter counts, CMRPC and Keep Charlton Beautiful status, checklist timeline.	Answered July 20 and in writing; documents delivered July 28. Landmark map July 20, Revision 1 August 4. Feedback summary posted. Abutter counts from assessor records. CMRPC briefed August 25. Keep Charlton Beautiful outreach pending.
DPP, Jul 13 and Jul 20, 2026	DPP and OEJE	Will a Cumulative Impact Analysis and site suitability assessment be done and shared?	Yes. Tool run July 17 (provisional; re-run before the Pre-filing Notice). Block group 250277561012 scores 80.9, a Burdened Area. Shared September 4 (agencies) and September 10 (committee); Exhibits B and C .
DPP, written Jul 13, 2026	DPP and OEJE	Website: an unconfirmed July 30 OEJE meeting on the timeline; event format and location; broken document links; email signup; 980 CMR 16.09 review.	Timeline entry removed until confirmed. Every event now shows format, location, and an accommodations note. Documents moved onto the site; signup link placed. Full 16.09(1)(a) audit July 20; open items tracked on the compliance page.
Resident J. P., Jul 14, 2026	Community	The July 8 mailer arrived late; wants another meeting.	We apologized and dropped the vendor. The meeting was also noticed on the website, flyer, and email list. We offered August 4 and the September 30 meeting.
Town Hall staff (C. Belk) for resident K. K., Jul 14 to 15, 2026	Community	August 4 listed as virtual only; residents without Zoom excluded; could it be shown in town?	August 4 was a virtual committee session open to all; the in-person meeting follows September 30 at Dexter Hall. We contacted the resident directly and gave Town Hall our project contact.
Town Hall staff (C. Belk), Jul 15, 2026	Local Government	Complaints that July 8 notices arrived late.	We acknowledged the error, dropped the vendor, and committed August 4 to mailed notice a month before September 30.

Source and date	Type	Issue raised	How considered, response, or design modification
Committee participant, written, Jul 21, 2026	Community	Define membership versus attendees; set goals and agendas; social media criticism of the late mailer; call Charlton a town.	The August 4 agenda addressed membership, goals, and standing agendas. Roster and charter published before the September 10 meeting. No design change.
Citizen Advisory Committee 2, Aug 4, 2026	Community	How much influence residents have; is the committee substantive?	The committee and added meetings are voluntary. The cut from 156 to 136 units came from public feedback.
Citizen Advisory Committee 2, Aug 4, 2026	Community	Frustration over the late July mailer.	We took responsibility and committed to mailed notice a month before the next meeting.
Citizen Advisory Committee 2, Aug 4, 2026	Community	Baseline and ongoing well testing; who pays if a well is affected.	The draft plan will specify testing offered, for which properties, who funds it, and enforcement. Well inventory and gradient screen done; borings and door-to-door survey follow. Groundwater questions went to MassDEP September 4.
Citizen Advisory Committee 2, Aug 4, 2026	Community	Groundwater and soil conditions; protection during construction and operation.	Parts of the parcel have groundwater near the surface; 76 percent of the pad is on poorly drained soil (Section A2.3). Current design includes liners, stormwater systems, and containment; foundations follow the borings.
Citizen Advisory Committee 2, Aug 4, 2026	Community	Fire Department staffing, equipment, and training.	Emergency Action Plan under way with the department; the town picks an independent reviewer at our cost. Department cost estimates in progress with the Chief. The webinar covered equipment and training.
Citizen Advisory Committee 2, Aug 4, 2026	Community	Backup power for cooling and suppression in an outage.	Per the consultant (August 19), current systems keep adjacent units safe without powered cooling, shown by UL 9540A large-scale testing. Fire response is defensive: disconnect, protect surroundings, monitor air.
Citizen Advisory Committee 2, Aug 4, 2026	Community	Long-term financial protection: bonds, insurance, replacement, decommissioning.	Decommissioning assurance set before construction, independently sized and updated. Pollution liability insurance for construction and operation. Every plan item states funding and enforcement.
Citizen Advisory Committee 2, Aug 4, 2026	Community	Binding agreement over a plan; what if the project is sold?	Permit conditions and the bond run with the project. The rules require us to pursue a plan; the town and the project decide together what enters a

Source and date	Type	Issue raised	How considered, response, or design modification
			signed agreement, with town counsel review.
Citizen Advisory Committee 2, Aug 4, 2026	Community	Plan ideas: senior and community center, conservation, habitat, historic sites, recreation.	Senior and community center support used as the worked example of a funded, enforceable item. Draft to the committee September 10, public September 30.
Citizen Advisory Committee 2, Aug 4, 2026	Community	Agreements and operating data from comparable projects.	Carver PILOT added to the Document Library with the Medway, Tewksbury, Revere, and Chelsea records; more comparables being compiled.
Committee member, letter Aug 4; answered Aug 24, 2026	Community	Formal request for a court-enforceable Community Benefits Agreement, not only a plan.	A plan discloses and discusses; an agreement is a contract. The Siting Board can make selected commitments permit conditions. The town and the project decide together what enters an agreement.
Committee member, letter Aug 4; answered Aug 24	Community	Decommissioning assurance in cash and letter of credit covering removal, remediation, recycling, hazardous waste; liability coverage; pre-construction soil analysis.	Bond posted before construction, sized by an independent published estimate with no salvage credit, re-estimated on a schedule. Pollution liability insurance. A pre-construction study documents baseline conditions.
Committee member, letter Aug 4; answered Aug 24	Community	Tie into the Route 20 water line and build firewater containment; over 95 percent of residents use wells.	Charlton's public water is a capped supply from a neighboring town and the nearest main is about two miles away, so on-site supply leads; decision with the Fire Chief. Current design captures firefighting water on an impermeable surface.
A resident, website form Aug 4; answered Aug 24	Community	Will the process restart with proper notice, in-person meetings, and the eventual owner present? Is participation a checkbox?	No restart. Notice goes by mail, social media, and flyers. At least two more public meetings precede any filing, including September 30. Pre-filing engagement has standards under 980 CMR 16.00 that we must meet.
A resident, written Aug 4; answered Aug 24	Community	Why Charlton; alternatives evaluated; was avoiding forest a criterion; who benefits and who bears risk.	The interconnection point drove site selection. Exhibit B documents suitability. Disturbance at or under 10 acres; replanting committed. Beneficiaries: landowner lease, town revenue, the Community Benefits Plan.
A resident, written Aug 4; answered Aug 24	Community	What Charlton receives: PILOT amount and term, value per household, costs, rates, permanent jobs, a binding agreement before approval, treatment on sale.	No PILOT figure agreed; tax research to be published; the town negotiates with expert help at our cost. No bill reduction. Small permanent staff;

Source and date	Type	Issue raised	How considered, response, or design modification
			local hiring a plan topic. Protections bind future owners.
A resident, written Aug 4; answered Aug 24	Community	Cumulative effects on rural character, forests, traffic, property values; abandonment; evidence from comparable facilities with ten years of operation.	Exhibits B and C become public record. We offered a matched-pair property value study by a licensed appraiser. Bond and permit conditions address abandonment. We provided Massachusetts projects in service and national incident data.
A resident, written Aug 4; answered Aug 24	Community	Wells: an independent hydrogeologic study, well counts by distance, substances released, firefighting water capture.	Hydrogeologic study with well inventory under way, to be published with counts (Section A2.4). Current design captures firefighting water on an impermeable surface.
A resident, written Aug 4; answered Aug 24	Community	Well testing terms; who pays; protection years later or after a sale.	Testing terms go in the draft plan. Owner cleanup liability under state law; pollution insurance. Well protection proposed for binding treatment; permit conditions remain the binding mechanism.
A resident, written Aug 4; answered Aug 24	Community	Fire response: department capacity, 30-year costs, water source, evacuation, independent plan review.	The Fire Chief determines capacity; we bear facility-created costs. On-site water storage matched to tanker capability is an option. Town officials set evacuation and notification, informed by plume modeling. A town-selected reviewer at our cost.
A resident, written Aug 4; answered Aug 24	Community	Noise: background and predicted levels, terrain, limits, testing, home counts, contour map, night operation, complaints, curtailment, compensation.	Sound study committed (Section A2.4), published with a contour map, home-by-home predictions, and counts. Permit conditions set limits under the MassDEP policy. Testing, complaints, curtailment, and compensation are open plan topics; no compensation guarantee.
A resident, written Aug 4; answered Aug 24	Community	Decommissioning: estimate updates, security before operation, bankruptcy or sale, verified disposition, restoration, post-closure contamination.	Independent estimate, re-estimated on a schedule, no scrap credit. Bond before construction, attached to the project. Disposition verified. Restoration standard in the filed plan. Post-closure liability in the same framework.
A resident, written Aug 4; answered Aug 24	Community	Closing: the town should not decide before studies, finances, emergency plans, and agreements are complete and reviewed.	We ask for no decision before those documents are public. Sound study and emergency planning scopes include these questions; groundwater questions went to MassDEP

Source and date	Type	Issue raised	How considered, response, or design modification
			September 4. The Commitment Tracker tracks each commitment.
Charlton Fire Department, Aug 4, 2026	Local Government	Agenda: protection systems, access, hazard mitigation, thermal runaway, shutdown, department role. No specific requests recorded.	Table A3.1 . Emergency Action Plan and water source decision in progress.
DPP, Aug 17, 2026	DPP and OEJE	The agency list is ours to identify; update it; hold the second meeting after agency consultation.	Table A3.1 . Consultation held September 4; second meeting September 30.
Fire Safety Webinar, Aug 19, 2026, session 1 (L. Degnan)	Community	What keeps unburned units safe without power; spacing versus insulation; test configuration; vent side-jetting risk.	Consultant: UL 9540A large-scale testing at field spacing shows adjacent units stay safe without power; Megapack 3 venting and explosion control described. Test report and hazard analysis with the Application.
Fire Safety Webinar, Aug 19, 2026, session 2 (L. Degnan)	Community	Build water supply and containment now; does hydrogen fluoride reach groundwater; impermeable surface; condensation.	Consultant answered on the recording. Current design captures firefighting water on an impermeable surface; water source decision with the Chief. We make no statement on groundwater effects (Section A2.3).
Fire Safety Webinar, Aug 19, 2026 (resident A. A.)	Community	Will the plan be revisited as standards evolve; mutual aid capacity.	NFPA 855 requires a hazard mitigation analysis and annual department training. The Emergency Action Plan will include annual tabletop training, review after any incident, and mutual-aid departments.
Fire Safety Webinar, Aug 19, 2026 (other participants)	Community	Senator Fattman's district staff offered to liaise with the state; a phone attendee plans to attend September 30.	Offer noted. Recordings of both sessions posted August 31.
Fire Safety Webinar, Aug 19, 2026 (Fire Chief Rob Barton)	Community	No hydrants nearby; nearest line at Route 169 and Snake Hill Road; the department will retain a consultant; large incidents need mutual aid.	Water source decision in progress. Town-selected independent reviewer at our cost. The plan includes pre-operational and annual training, mutual-aid tours, and tabletop exercises. Table A3.1 .
CMRPC staff briefing, Aug 25, 2026	Key Stakeholder	Introductory briefing; CMRPC is helping member towns prepare for the new process. No design comment.	Regional planners added to Key Stakeholder engagement. Notes in progress, available on request.
Bill Fontaine, Planning Board, written Aug 27, 2026	Local Government	More meetings; two weeks' notice outside holiday weeks; reach school families, employers, seniors, youth sports, faith groups, service organizations; late notices.	Table A3.1 . Replied August 31; mailer program and targeted outreach under way.

Source and date	Type	Issue raised	How considered, response, or design modification
DPP (P. Dieffenbach), written Sep 1, 2026	DPP and OEJE	Publicize the September 5, 6, and 10 events; consider open houses and tabling; keep DPP informed.	Table A3.1.
Public Meeting 1 follow-up, as of Sep 4, 2026	Community	July 28 listed three July 8 questions as pending without naming them.	Every July 8 question is marked answered. Four answers still defer a figure or study: annual energy stored, sound levels at homes, the plume analysis, and the town tax figure.
Interagency consultation, Sep 4, 2026	DPP and OEJE	Agencies asked for all 980 CMR 16.06(1)(a) items 1 to 12.	Table A3.2.
Interagency consultation, Sep 4, 2026: MEPA Office	State agency	An ENF or EIR is likely not required for a Board-permitted facility.	Table A3.1. Written confirmation requested.
Interagency consultation, Sep 4, 2026: agency requests	State agency	Eighteen requests from MassDEP, the MEPA Office, NHESP, Siting Division staff, and DPP: wetlands, alternatives, stormwater, rare species, gen-tie route, tribal outreach, and more.	Table A3.1. , one row per request.
Old Home Day tabling, Sep 6, 2026	Community	Conversations at the table; comments being written up.	Added in the next update. Mailers distributed at the table and through community groups. Kitchen Table Talks (September 5) postponed; comments added when held.

A4.2 Design and program changes made in response to comments

1. Total disturbance on the parcel held at or under 10 acres, a published bound. DPP and OEJE asked April 9 for a clear clearing limit; forest and topsoil concerns followed April 14, June 3, and July 8.
2. A third public meeting added (early November 2026, on the revised draft Community Benefits Plan), with the Citizen Advisory Committee and the fire safety webinar as topic sessions. DPP and OEJE recommended more sessions April 9; residents asked for more in-person opportunities in July and August.
3. Abutter conversations run alongside agency meetings, as OEJE and DPP asked April 9: door-knocking April 14 to 15; Kitchen Table Talks set for September 5 postponed and being rescheduled.
4. Second public meeting set for September 30, after the September 4 consultation as DPP recommended, with a midday and an evening session.
5. Second committee meeting moved from early July to August 4 so the first public meeting came first, at the Planning Board's June 3 request.
6. Notice for the second public meeting mailed a month ahead (1,953 pieces, August 31) with copies through community groups, after the late July 8 mailer, Bill Fontaine's August 27 email, and DPP's September 1 email.

Appendix A5. Supporting documentation index

Attached means the item is in the folder shared with DPP on July 31, 2026 (folders 01 to 10), is added to it with this update, or is transmitted with this packet. Posted at URL means it is on the project website at the address given. Available on request means we hold it and produce it to DPP on request. Studies not yet produced are listed in [Section A2.4](#), not here.

Table A5.1. Supporting documentation

No.	Document	Source and location	Status
1	Meeting notes: April 9 (DPP and OEJE), April 14 (Select Board), June 3 (committee and Planning Board), June 4 (Town Administrator)	Folder 01. April 9 and June 3 committee minutes also at carpenterhillpower.com/documents	Attached; two posted at URL
2	Meeting notes: August 25 CMRPC briefing (being written); September 4 consultation (source for the September 4 rows)	Our records	Available on request
3	Not on file: July 20 follow-up (no record); August 26 follow-up (agenda only)	Not in the shared folder	No record exists
4	Citizen Advisory Committee meeting 2 minutes and slides, August 4	carpenterhillpower.com/documents/cac-meeting-2-minutes/ ; /meetings/cac-2	Posted at URL
5	Fire Safety Webinar recordings, August 19 (two sessions)	carpenterhillpower.com/engagement-log#fire-webinar	Posted at URL
6	Public Meeting 1 notice evidence: outreach log (revised September 4); notice, flyer, Villager ad and submission; June 23 email invitations; postcards and USPS route record	Folder 03	Attached
7	Public Meeting 1 record: transcript; July 17 written answers; decommissioning handout; Town event board photo; posters, dot boards, comment cards	Folder 03; posters and dot boards at /files/carpenter-hill-public-meeting-1-posters.pdf and /files/carpenter-hill-public-meeting-1-dot-boards-comment-cards.pdf	Attached; two posted at URL
8	Attachment A : Public Meeting 1 record under 980 CMR 16.07 and 16.08, with the Language Demographic Analysis	With the signed form; analysis memo and data in folder 05	Attached
9	Public Meeting 1 sign-in sheets	Folders 03 and 09	Attached; not posted (980 CMR 16.09(1)(a)17); produced on request (16.04(1)(g)5)
10	Records of Public Communication: resident J. P. (June to July); Town Hall staff for resident K. K. (July 14 to 15)	Folder 02	Attached
11	Correspondence since July 28: a resident's August 4 submission and our August 24 response; Bill Fontaine August 27, our reply August 31, his reply September 1	Our correspondence record	Available on request

No.	Document	Source and location	Status
12	Community Engagement Plan, July 2026 update	carpenterhillpower.com/files/carpenter-hill-community-engagement-plan.pdf; folder 04	Posted; attached. Section A1 supersedes its agency table
13	Key Stakeholders list, July 24	Folder 04	Attached; not posted (names individuals)
14	Permit and agency matrix, July 24	Folder 04	Attached
15	Permit and agency matrix, working file August 26 (MESA row corrected: no filing)	Folder 04, added with this update	Attached
16	Project Location Map (one-mile landmarks), two sheets, Revision 1, August 4	carpenterhillpower.com/files/carpenter-hill-project-location-map.pdf; folder 06	Posted; attached
17	Facility Boundary map, 17.29 acres, from site plan G101 revision 16 (Section A2.1)	Deck slide "The Facility Boundary measures 17.29 acres" (item 18)	In the deck PDF; image on request
18	Interagency consultation deck, September 4 (corrected export)	carpenterhillpower.com/meetings/agency-consultation-1; PDF added to the shared folder	Attached; posted at URL
19	Exhibit B : Site Suitability Analysis, preliminary draft	carpenterhillpower.com/files/carpenter-hill-site-suitability-analysis-draft.pdf; web version at /reports/site-suitability	Attached; posted at URL
20	Site Suitability Mapping Tool output, July 17 run (5.7 acres)	Our project record; scores in Exhibit B and Table A2.2	Available on request, provisional
21	Exhibit C : Cumulative Impact Analysis, preliminary draft, on the EFSB template	carpenterhillpower.com/files/carpenter-hill-cumulative-impact-analysis-draft.pdf; web version at /reports/cumulative-impact	Attached; posted at URL
22	MassEnviroScreen block group analysis with the 980 CMR 16.06(1)(a)9 map	Deck slide "The site sits inside a Burdened Area"; Exhibit C	In the deck PDF and Exhibit C
23	Site plan G101, revision 16, June 10 (preliminary)	carpenterhillpower.com/files/carpenter-hill-site-plan.pdf; folder 05	Posted; attached
24	Maps presented September 4: regional locus; environmental resources at parcel and one-mile scale	Deck PDF (item 18)	In the deck PDF
25	Earlier technical sheets: Critical Issues Analysis (Stantec, November 2023); elevation, wetlands index, and aerial maps	carpenterhillpower.com Document Library, Technical Specifications	Posted at URL
26	Letter to the Massachusetts Commission on Indian Affairs, August 10	Our correspondence record	Available on request; no reply on file
27	CMRPC correspondence, August 17 to 24	Our correspondence record	Available on request
28	Website records: engagement log, Commitment Tracker, Document Library, siting-rules crosswalk, meeting pages	carpenterhillpower.com; July 23 screenshots in folder 07	Posted at URL

No.	Document	Source and location	Status
29	This packet: form, Attachment A , appendix, cover letter, Exhibits B and C	Filed by email; posted at carpenterhillpower.com/files/carpenter-hill-status-checklist-2026-09-10.pdf	Posted at URL
30	Reference and originals: 980 CMR 16.00 text; engagement photographs; outreach originals	Folders 08, 09, 10	Attached

Attestation

All information provided in this checklist, [Attachment A](#), the appendix, and the exhibits is complete and accurate to the best of my knowledge. Upon request, I agree to provide DPP with additional information or documentation.

Name of signatory: **Wes Shaffer, AICP**

Title: **Director of Planning and Engagement, ESA Solar, on behalf of
Carpenter Hill Power, LLC**

Date: **September 10, 2026**

Signature: Wes Shaffer

Additional Appendices (separate files)

Appendix B	Site Suitability Analysis, preliminary draft, September 2026. Nine sections: the rule, the site and Facility Boundary, anticipated scores, each criterion, findings beyond the six criteria, how the criteria shaped the design, next steps, sources. Based on the July 17, 2026 tool run on 5.7 acres; re-run on the 17.29-acre Facility Boundary before the Pre-filing Notice. carpenterhillpower.com/files/carpenter-hill-site-suitability-analysis-draft.pdf ; web version at carpenterhillpower.com/reports/site-suitability .
Appendix C	Cumulative Impact Analysis, preliminary draft, September 2026, on the EFSB CIA Report Template (Tables 1 to 10): the Specific Geographical Area, the Burdened Area, the Elevated Indicators, construction and operations impacts, avoidance and mitigation, benefits, conclusion, community input, sources. Every determination is preliminary and names the study it depends on. The CIA Report is filed with the Application. carpenterhillpower.com/files/carpenter-hill-cumulative-impact-analysis-draft.pdf ; web version at carpenterhillpower.com/reports/cumulative-impact .

CARPENTER HILL POWER · CHARLTON, MASSACHUSETTS · 980 CMR 15.10

Site Suitability Analysis

The anticipated scores for the site under the state's six suitability criteria, what sits behind each one, and how the criteria have shaped the site and the design so far.

Preliminary draft · v0.1

September 8, 2026

3 open items

This is a preliminary draft prepared for the Citizen Advisory Committee and the public before the state's Site Suitability Mapping Tool is re-run on the correct 17.29-acre Facility Boundary. Every score in it is provisional. The final Site Suitability Report is filed with the Application, expected in early 2027, and every version of this report stays published.

Carpenter Hill Power, LLC. Docket: Not yet assigned (pre-filing). Prepared by Wes Shaffer, AICP, Director of Planning and Engagement, ESA Solar, on behalf of Carpenter Hill Power, LLC. The live version, the slides and every document this report rests on are at carpenterhillpower.com/reports/site-suitability.

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WHAT THIS REPORT FOUND

1. Five of the six state criteria carry a provisional score: burdens 4.0, carbon 3.7, biodiversity 2.9, agriculture 0.0, and no overlap with protected open space. Climate change resilience is not scored by the tool for an inland site.
2. The July 17, 2026 run scored a 5.7-acre pad footprint. The Facility Boundary the rule defines is 17.29 acres, so the tool is being re-run before the Pre-filing Notice.
3. The one score design cannot move is the 4.0 for burdens, set by the block group's MassEnviroScreen score of 80.9.
4. Beyond the criteria, the site screening found poorly drained soil under the pad, drainage south to a wetland, a buffer zone overlap, a slope exceedance, and two downgradient wells. Each is assigned to a study.

Text in [square brackets] is a decision or a fact that is not settled yet. There are 3 of them in this draft.

WHAT THIS REPORT IS AND WHAT IT FOUND

1 Summary

The state scores every proposed clean energy site on six criteria before the Siting Board decides on it. This report gives the anticipated scores for the Carpenter Hill site, explains what sits behind each one, adds what the site screening found beyond the six criteria, and records how all of it has shaped the design so far.

17.29 ac

Facility Boundary under 980 CMR 15.02, measured from site plan G101 revision 16

5.7 ac

Site area the July 17, 2026 tool run scored, so every score here is provisional

4.0 of 5

Social and environmental burdens score, fixed by the block group's MassEnviroScreen score of 80.9

0

Automatic 5.0 scores. No overlap with protected open space

The Carpenter Hill Power project is a Large Clean Energy Storage Facility, so the Executive Office of Energy and Environmental Affairs' Site Suitability Guidance applies to it under 980 CMR 15.10(1). The rule asks two things of the project before it files. First, run the state's Site Suitability Mapping Tool on the site to derive anticipated Criteria-specific Suitability Scores (980 CMR 15.10(2)). Second, share those anticipated scores with stakeholders during the pre-filing period. This report does the second. The final Site Suitability Report is filed with the Application for a Consolidated Permit under 980 CMR 15.10(3), and the scores in it are final unless the Director revises them on request or the Board applies a modifier.

The scale runs from 0.0, the most suitable, to 5.0, the least suitable. A high score is a reason for the Board to look harder at avoidance, minimization and mitigation, not a bar to approval. The Board considers the scores in its route and site scoring analysis and in its decision on whether to grant the permit (980 CMR 15.10(6)).

READ THIS FIRST

The July 17, 2026 run scored a 5.7-acre site area, the pad footprint at the time. The regulation defines the Facility Boundary as the outermost area of construction or disturbance, or the fence line, plus the edge of the right of way for linear components. Measured that way, the project is 17.29 acres. The tool is being re-run on the correct boundary before the Pre-filing Notice planned for December 2026, and the results will replace the provisional scores on this page. We would rather show the correction than have it turn up later.

The six criteria at a glance. Provisional scores from the July 17, 2026 run on a 5.7-acre site area.

Criterion	Provisional score	Will the re-run move it?
Social and environmental burdens	4.0 of 5	No. A lookup from the block group's MassEnviroScreen score.
Carbon sequestration and storage	3.7 of 5	Probably. The correct boundary adds about 11.6 acres, most of it forest.
Biodiversity	2.9 of 5	Probably, for the same reason.
Agricultural resources	0.0 of 5	Re-run rather than assumed. The boundary clips 0.009 acre of prime soil at the road.
Climate change resilience	Not scored	The tool scores coastal hazards. Inland exposure is documented separately in Section 5.
Protected open space	No overlap	No. The boundary comes within 373 feet of protected open space without touching it.

980 CMR 15.10 AND THE SITE SUITABILITY GUIDANCE

2 What the rule requires

980 CMR 15.10 is short. It tells the project which guidance to follow, when to run the tool, when the scores become final, who can ask for them to be revised, and how the Board uses them. This section walks through it so a reader can check the rest of the report against the rule.

980 CMR 15.10, subsection by subsection, and where this project stands.

Subsection	What it says	Where this project stands
15.10(1) Applicability	The Site Suitability Guidance applies to large and small clean energy generating and storage facilities, and to transmission and distribution facilities only in newly established public rights of way.	Applies. The project is a Large Clean Energy Storage Facility. The gen-tie runs in a private easement, not a new public right of way, so it is scored as part of the facility rather than as a separate transmission facility. [Reading to confirm with DPP.]
15.10(2) Pre-filing	Use the Site Suitability Mapping Tool to derive anticipated Criteria-specific Suitability Scores before filing, and share them with stakeholders during pre-filing under 980 CMR 16.00.	Run on July 17, 2026 on a 5.7-acre site area. Shared with state agencies on September 4, 2026, with the Citizen Advisory Committee on September 10, and published here. Re-run on the 17.29-acre Facility Boundary due before the Pre-filing Notice.
15.10(3) File with Application	File a Site Suitability Report with the Application for a Consolidated Permit. The scores in it are final unless revised under (4) or modified under (5).	Prepared for the Application, anticipated February to March 2027.
15.10(4) Request for Score Revision	The applicant, a Local Government or any Key Stakeholder who believes a score rests on materially erroneous, incomplete or faulty data may ask the Director to revise it, naming the specific deficiency. The Director decides within 30 days.	Open to any reader of this report. Section 9 says how.
15.10(5) Score modifier	The Board may modify scores when the applicant agrees to provide certain social or environmental benefits described in the guidance, and only by mutual written agreement between the applicant and a Local Government.	A decision for the Town of Charlton and the project together. This report carries the 4.0 burdens score as it stands and does not count on a modifier.

Subsection	What it says	Where this project stands
15.10(6) Board consideration	The Board considers the Site Suitability Report in its cumulative impact analysis and its route and site scoring, uses the scores to assess avoidance, minimization and mitigation, and considers them in the permit decision. It may treat a Community Benefit Agreement as evidence of benefits.	The Cumulative Impact Analysis is a separate report, linked at the end of this one.

The six criteria and how each is scored

The state's tool scores the site footprint on a grid of cells and reports one number per criterion. Four criteria come from statewide index layers. One is a lookup from MassEnviroScreen. One is a yes-or-no overlap test. The tool's own report states the method for each.

Criterion	How the tool scores it	Scale
Social and environmental burdens	A band lookup from the highest MassEnviroScreen score of any block group the site overlaps: 0 to 10 percent scores 0.0, above 10 to 30 scores 1.0, above 30 to 50 scores 2.0, above 50 to 70 scores 3.0, above 70 to 90 scores 4.0, above 90 scores 5.0.	0.0 to 5.0
Carbon sequestration and storage	The mean of all Ecosystem Carbon Index values across the site.	0.0 to 5.0
Biodiversity	The mean of the top quarter of Biodiversity Index values across the site.	0.0 to 5.0
Agricultural resources	The mean of the top half of Agricultural Resource Index values across the site.	0.0 to 5.0
Climate change resilience	Exposure to sea level rise and storm surge. The tool returns no value for a site with neither.	0.0 to 3.0
Protected open space	Whether the site overlaps mapped Protected Open Space. An overlap is an automatic 5.0.	Overlap or no overlap

WHAT THE SCORES ARE NOT

The scores compare this footprint with the state's index layers. They are not a field survey, they do not test whether any regulatory threshold is exceeded, and a high score on one criterion does not decide the permit. Section 7 lists what the field work still has to establish.

980 CMR 15.02, DEFINITION OF FACILITY BOUNDARY

3 The site and the Facility Boundary

Every score depends on what area the tool is asked to score. The regulation names that area the Facility Boundary. This section measures it from the current site plan, shows the three pieces that make it up, and records the two places the drawing and its title block disagree.

980 CMR 15.02 defines the Facility Boundary as the outermost boundary of the project site, such as a building or other structure or the outermost area of construction activity or disturbance, or the project fence line. For a linear component such as a transmission line, the Facility Boundary is the edge of the right of way. The Site Suitability Mapping Tool scores whatever polygon it is given, so the polygon has to be this one.

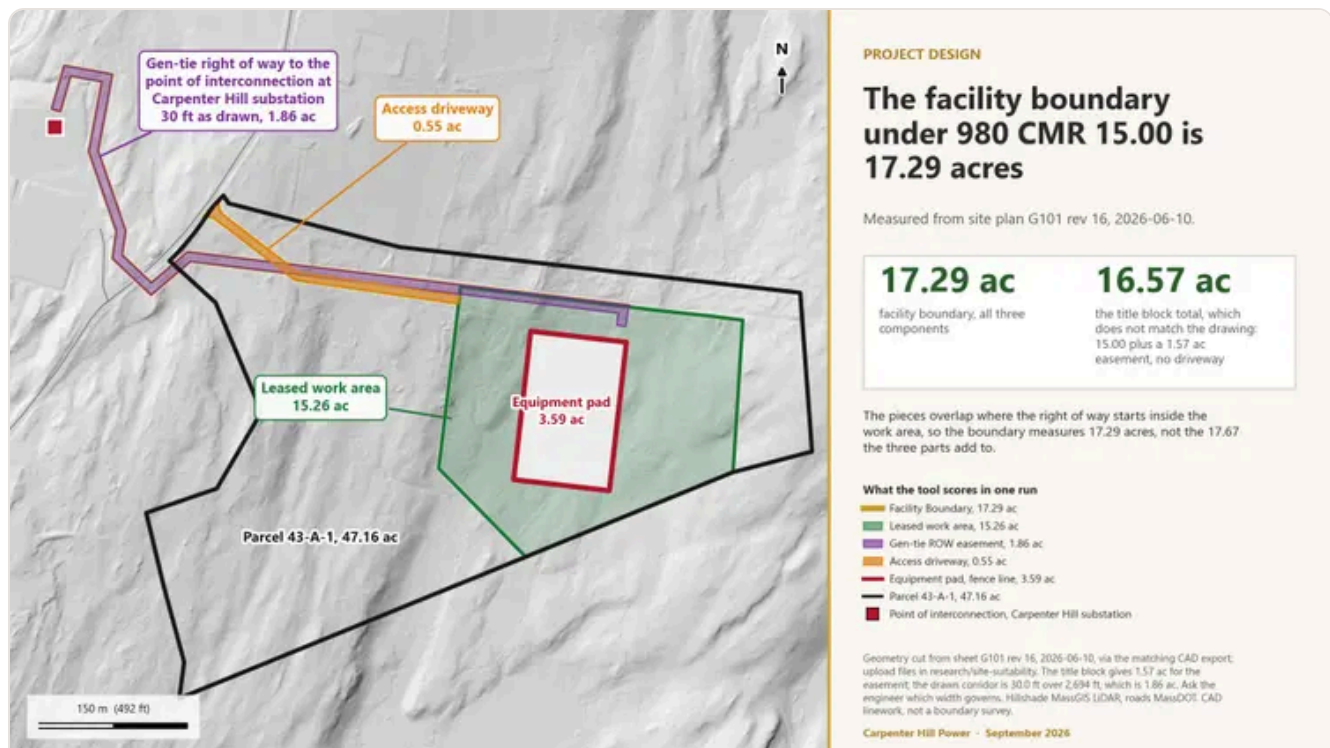


Figure 1. The 17.29-acre Facility Boundary: BESS project area, gen-tie right of way and access driveway, merged.

Geometry cut from sheet G101 rev 16, 2026-06-10, via the matching CAD export; upload files in research/site-suitability. The title block gives 1.57 ac for the easement; the drawn corridor is 30.0 ft over 2,694 ft, which is 1.86 ac. Ask the engineer which width governs. Hillshade MassGIS LiDAR, roads MassDOT. CAD linework, not a boundary survey.

Facility Boundary components, measured from site plan G101 revision 16 (June 10, 2026). The pieces overlap where they meet, so they add to more than the total.

Component	Dimensions	Area measured	Title block
Parcel 43-A-1	131 Carpenter Hill Road, Charlton	47.16 acres	47.13 acres
BESS project area	The leased work area: rows of 136 battery units on a fenced gravel pad, a 26-foot fire lane around the equipment, 50 feet from equipment to fence, and the construction work limits	15.26 acres	15.00 acres
Battery equipment area	The fence line around the equipment itself	3.59 acres	not listed
Gen-tie easement	2,694 feet by 30 feet, overhead to underground at the road, ending 55 feet from the substation	1.86 acres	1.57 acres (68,229 square feet)
Access driveway	About 951 feet by 26 feet from Carpenter Hill Road to the project area, outside both the project area and the easement	0.55 acre	not listed
Facility Boundary, total	One merged polygon	17.29 acres	16.57 acres

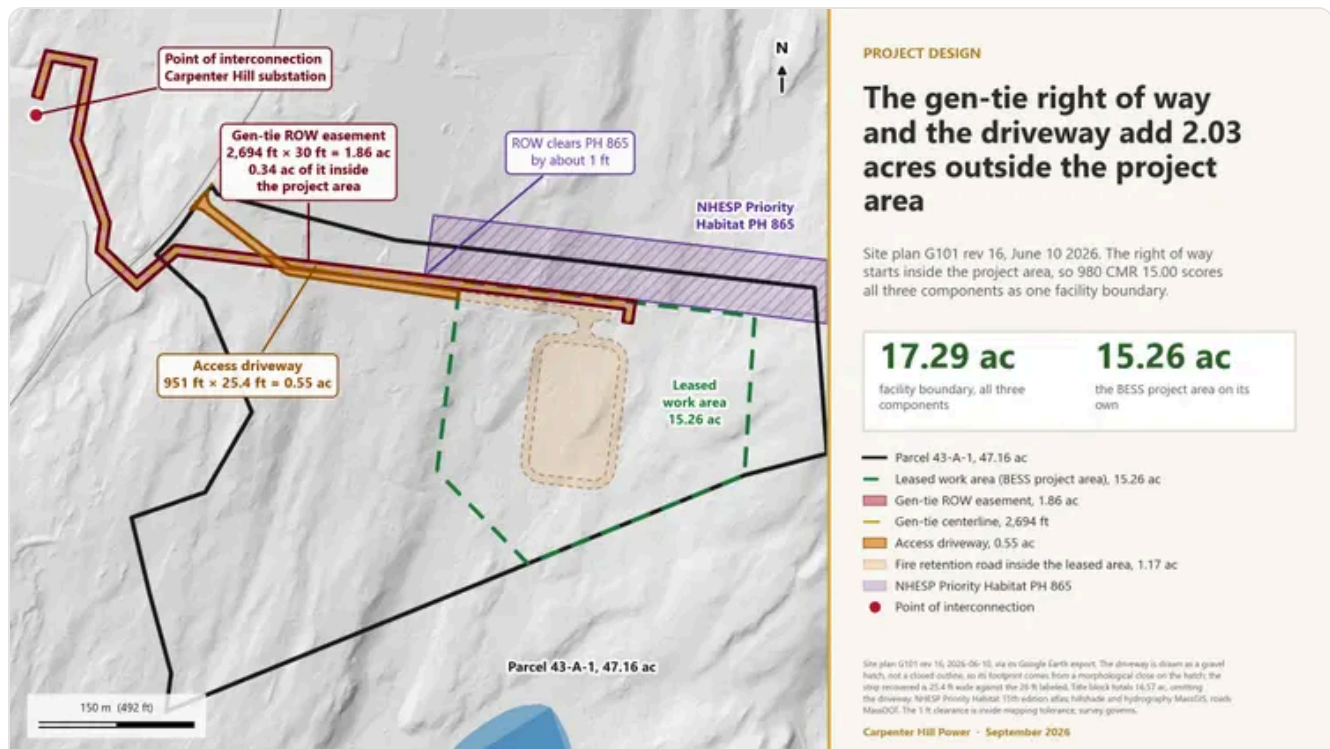


Figure 2. The two linear components: the gen-tie right of way to the substation and the driveway from Carpenter Hill Road.

Site plan G101 rev 16, 2026-06-10, via its Google Earth export. The driveway is drawn as a gravel hatch, not a closed outline, so its footprint comes from a morphological close on the hatch; the strip recovered is 25.4 ft wide against the 26 ft labeled. Title block totals 16.57 ac, omitting the driveway. NHESP Priority Habitat 15th edition atlas; hillshade and hydrography MassGIS, roads MassDOT. The 1 ft clearance is inside mapping tolerance; survey governs.

Two things the drawing and its title block disagree on

- The easement area. The polygon on the plan's perimeter layer is a clean 30-foot corridor over the 2,694-foot route, which is 80,866 square feet or 1.86 acres. The title block says 68,229 square feet, and that figure divided by the same route length gives a width of 25.3 feet. It reads like a title block carried forward from a narrower easement. [Which width governs is being confirmed with the project engineer.] The geometry here uses the drawn 30 feet, the larger of the two.
- The total. The title block's 16.57 acres is 15.00 plus 1.57 and leaves the driveway out. The driveway is ground disturbance outside both the project area and the easement, so under the definition it belongs inside the boundary.

The 15.26-acre project area is the leased work limit, not the clearing. Total disturbance on the parcel, including tree clearing, is held at or under 10 acres under a published commitment on the Commitment Tracker, and the fenced equipment area is about 5 acres or less. Nothing in the project record designates any part of the parcel outside the Facility Boundary for a particular use, and this report makes no such claim.

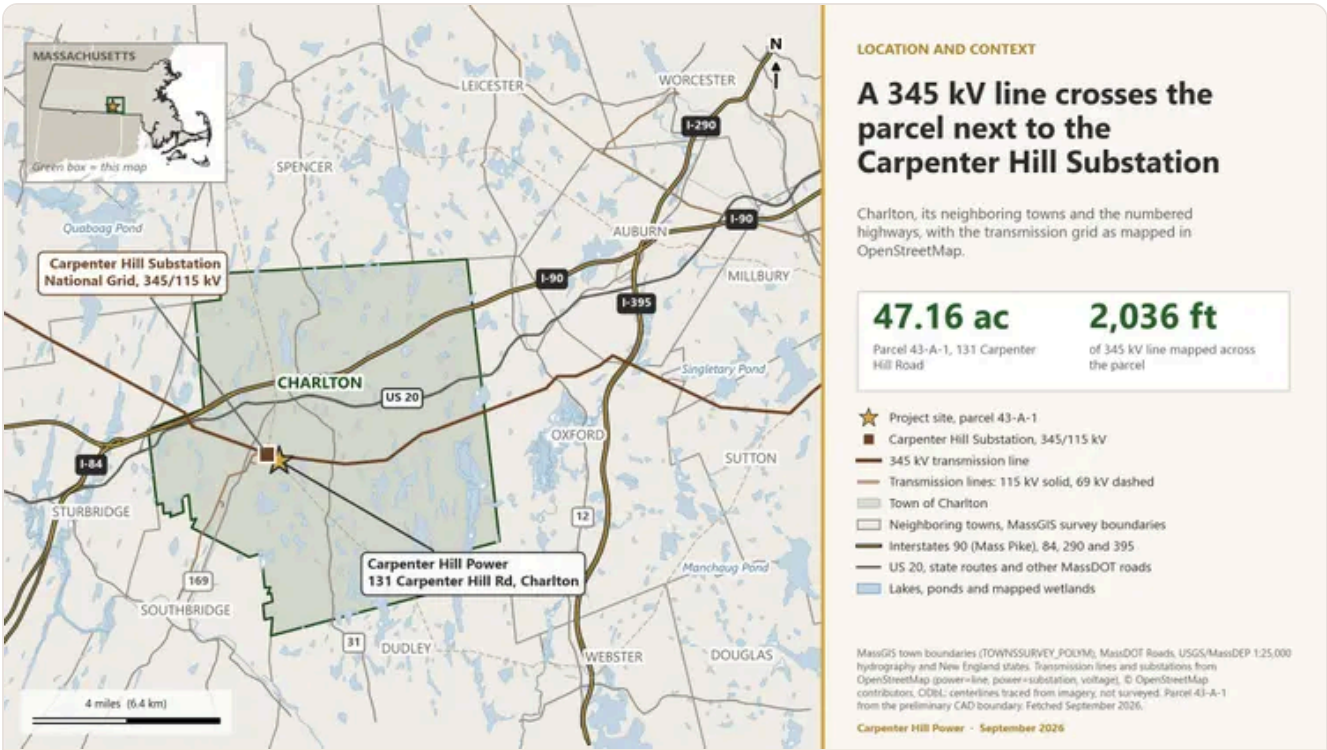


Figure 3. Regional locus. The 345 kV line built in 1967 crosses the parcel next to the Carpenter Hill substation. MassGIS town boundaries (TOWNSSURVEY_POLYM), MassDOT Roads, USGS/MassDEP 1:25,000 hydrography and New England states. Transmission lines and substations from OpenStreetMap (power=line, power=substation, voltage), © OpenStreetMap contributors, ODbL; centerlines traced from imagery, not surveyed. Parcel 43-A-1 from the preliminary CAD boundary. Fetched September 2026.

980 CMR 15.10(2), JULY 17, 2026 TOOL RUN

4 Anticipated scores

These are the numbers the state tool produced for a 5.7-acre site area on July 17, 2026, with the statistics the tool prints beside each one. They are the anticipated scores 980 CMR 15.10(2) asks the project to share. None is final.

4.0 / 5.0**SOCIAL AND ENVIRONMENTAL BURDENS**

Band lookup from the host block group's MassEnviroScreen score of 80.9, which falls in the above-70-to-90 band. The tool takes the highest score of any overlapping block group; only one block group overlaps. This score does not move with the boundary or the design.

3.7 / 5.0**CARBON SEQUESTRATION AND STORAGE**

Mean of all Ecosystem Carbon Index values across 25 grid cells. The tool also reports a 25th percentile of 3.5 and a median of 3.9. Expected to move on the re-run: the corrected boundary adds about 11.6 acres, most of it forest.

2.9 / 5.0**BIODIVERSITY**

Mean of the top quarter of Biodiversity Index values across 25 cells. The mean of all cells is 2.6 and the median 2.5. Expected to move for the same reason. Mapped rare species habitat comes within about a foot of the corrected boundary without overlapping it.

0.0 / 5.0**AGRICULTURAL RESOURCES**

Mean of the top half of Agricultural Resource Index values. Every cell in the 5.7-acre area scored zero. The corrected boundary clips about 0.009 acre of prime farmland soil unit 305B where the gen-tie easement meets the road, so this one is re-run rather than assumed.

Not scored**CLIMATE CHANGE RESILIENCE**

The tool's report carries no page for this criterion. It scores exposure to sea level rise and storm surge, and Charlton sits about 35 miles inland. FEMA places the whole site in Zone X, minimal flood hazard. The inland hazards that do apply, extreme precipitation and extreme heat, are documented from the state's Climate Resilience Design Standards Tool in Section 5.

No overlap**PROTECTED OPEN SPACE**

The tool reports that the site does not appear to overlap Protected Open Space. Measured on the corrected boundary, the nearest protected open space is 373 feet away. No automatic 5.0 applies on any criterion.

Scale runs 0.0 (most suitable) to 5.0 (least suitable); climate change resilience runs to 3.0. Source: Clean Energy Infrastructure Site Suitability Report, official Site Suitability Mapping Tool, July 17, 2026 run, 5.7-acre site area. FEMA FIRM panel 25027C0788F, effective June 21, 2023.

The MassEnviroScreen component scores the tool printed with the burdens criterion. The cumulative score is a statewide percentile; each component is scored 0 to 100.

Component	Score	What it measures
MassEnviroScreen cumulative burden score	80.9	Statewide percentile of the product of the two group scores below. The Burdened Area threshold under 980 CMR 15.04(1)(a) is 75.
Pollution and climate burden group	45.0	Environmental exposures 23.3, environmental effects 86.0, climate risks 47.6.
Population characteristics group	57.0	Sensitive populations 61.5, socioeconomic factors 52.4.

The site is not a brownfield, a landfill or previously developed land, so no development-potential modifier applies. The burdens score cannot be changed by design. Under 980 CMR 15.10(5) it may be modified only by mutual written agreement between the applicant and a Local Government, which is a decision for the Town of Charlton and the project together. This report carries the 4.0 as it stands.

SITE SUITABILITY GUIDANCE CRITERIA, READ AGAINST THE SEPTEMBER 2026 SITE SCREENING

5 Each criterion, and what sits behind it

A score is a number. This section says what is on the ground behind each one, using the state's own published layers pulled in September 2026, so a reader can see why the site scores as it does and what the re-run is likely to change.

5.1 Social and environmental burdens: 4.0

The site sits inside census block group 250277561012, Block Group 2 of Census Tract 7561.01, 2,525 acres with a population of about 1,525. Its MassEnviroScreen score of 80.9 places it in the above-70-to-90 band, which the tool scores 4.0. Of the block group's five component scores, environmental effects at 86.0 ranks 99.7th of the 5,109 Massachusetts block groups, while pollution exposure at 23.3 ranks about 15th. The effects component is a weighted count of cleanup sites, groundwater threats, solid waste sites, impaired waters and hazardous waste generators in and around the block group. What MassDEP maps inside it: six cleanup sites, three major regulated facilities, about 3.1 miles of Category 5 impaired stream, most of it Cady Brook, and the north edge of the Southbridge Landfill. None of these is on the parcel.

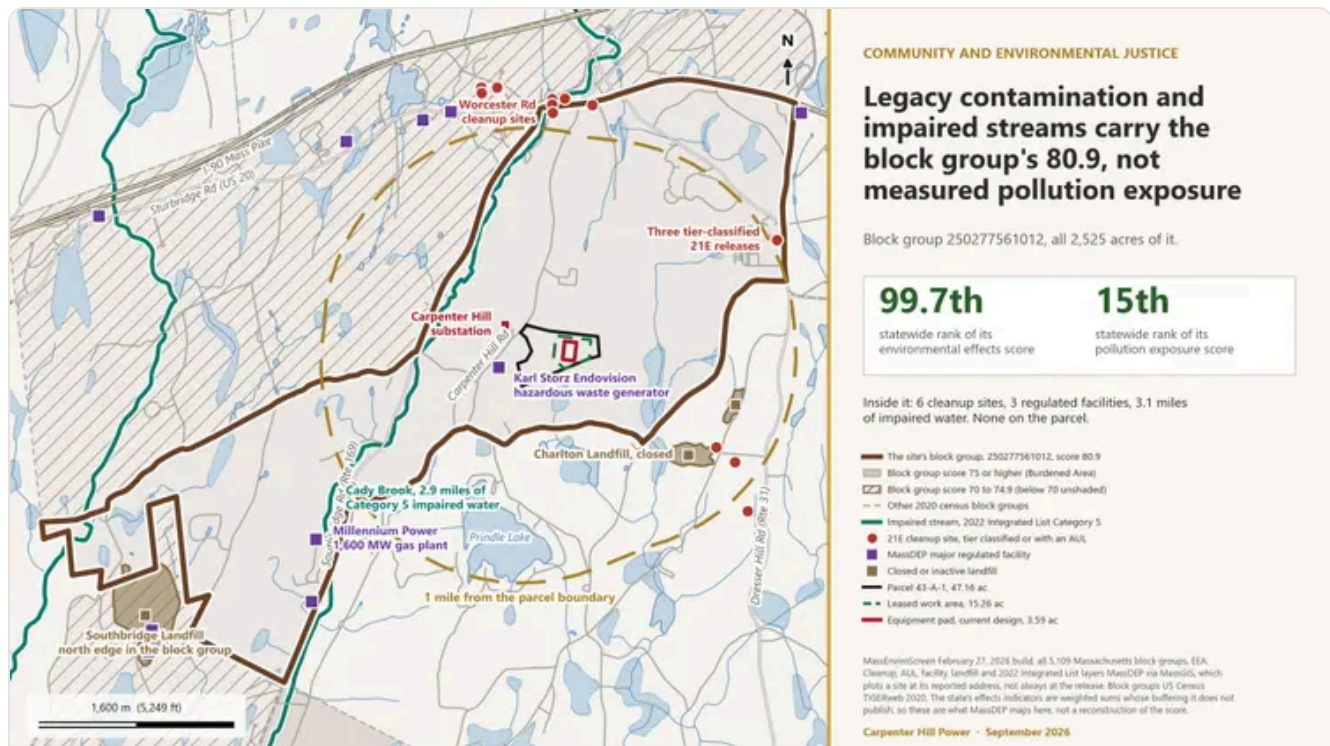


Figure 4. The site's block group, its MassEnviroScreen score, and the MassDEP features that sit behind the score.

MassEnviroScreen February 27, 2026 build, all 5,109 Massachusetts block groups, EEA. Cleanup, AUL, facility, landfill and 2022 Integrated List layers MassDEP via MassGIS, which plots a site at its reported address, not always at the release. Block groups US Census TIGERweb 2020. The state's effects indicators are weighted sums whose buffering it does not publish, so these are what MassDEP maps here, not a reconstruction of the score.

Because the score is a property of the block group, the design cannot move it. What the project can do is show that it does not add to the burdens the score measures, which is the job of the Cumulative Impact Analysis, and pursue a Community Benefits Plan, which the Board weighs separately under 980 CMR 15.11.

5.2 Carbon sequestration and storage: 3.7

The Ecosystem Carbon Index is high here because the site is forest. The 2016 MassGIS land cover puts evergreen and deciduous forest on 38.4 of the parcel's 47.1 acres, about 82 percent, and on 15.1 of the leased work area's 15.25 acres, about 99 percent. The equipment area is entirely forest. The corrected Facility Boundary adds the gen-tie easement and the driveway, both mostly wooded, so the re-run is expected to score at least as high.

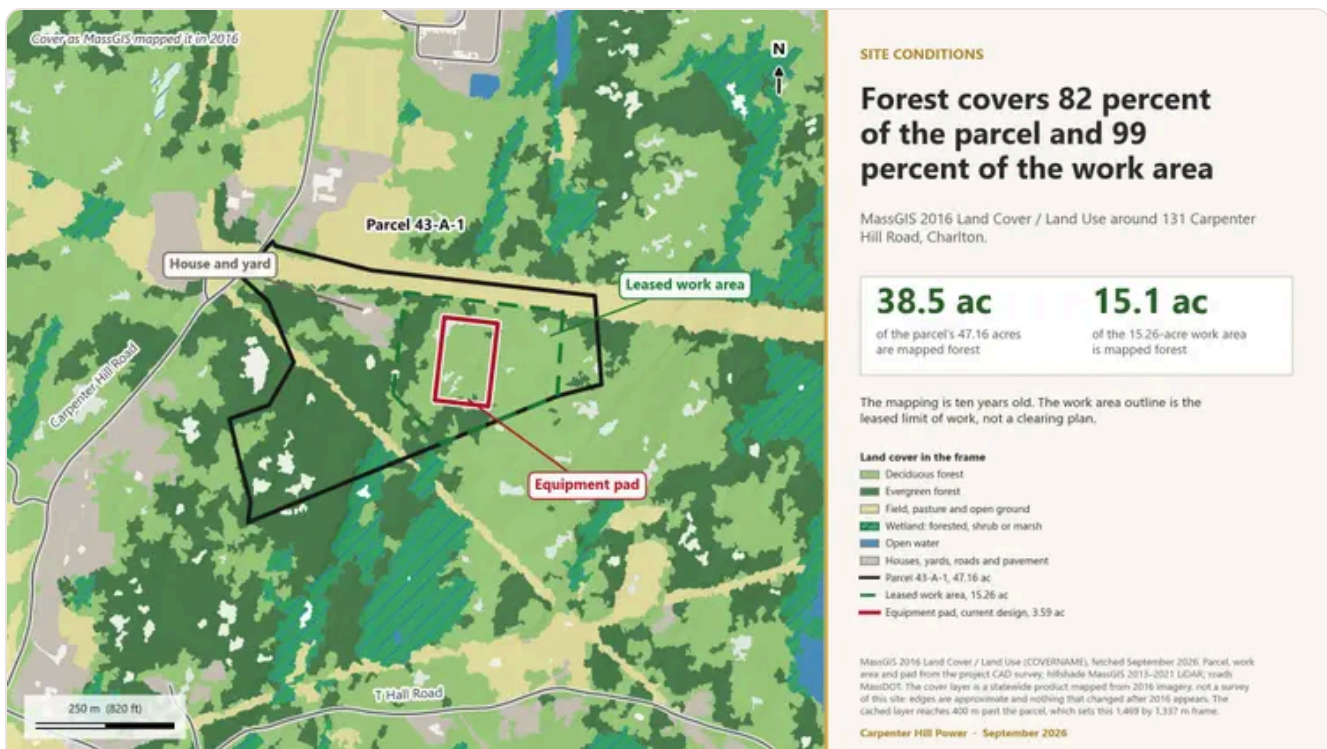


Figure 5. What is on the ground today. Forest covers 82 percent of the parcel and 99 percent of the leased work area.

MassGIS 2016 Land Cover / Land Use (COVERNAME), fetched September 2026. Parcel, work area and pad from the project CAD survey; hillshade MassGIS 2013–2021 LiDAR; roads MassDOT. The cover layer is a statewide product mapped from 2016 imagery; not a survey of this site; edges are approximate and nothing that changed after 2016 appears. The cached layer reaches 400 m past the parcel, which sets this 1,469 by 1,337 m frame.

The published commitment that answers this criterion holds total disturbance on the parcel, including tree clearing, at or under 10 acres. Corridor clearing outside the parcel stays inside the 1.86-acre right of way. The limit of work is drawn on the plans filed with the Application, and replanting to offset the acres cleared is expected as a permit condition. Any planting beyond that is a matter for the Community Benefits Plan, not a claim this report makes.

5.3 Biodiversity: 2.9

The Biodiversity Index across the 5.7-acre area is moderate, with a mean of 2.6 and a top-quarter mean of 2.9. The reason the re-run matters is at the parcel's northwest edge. NHESP Priority Habitat PH 865 and BioMap Rare Species Core 869 cover 2.89 acres of the parcel there. Neither reaches the leased work area or the equipment pad. Measured on the current drawing, the work area clears the habitat boundary by about 6 feet, the pad by about 125 feet, and the tie line by about 16 feet, but the access corridor runs within about a foot of it, with roughly 678 feet of the corridor inside 5 feet of the drawn edge. Those distances are finer than the layer's own mapping tolerance.

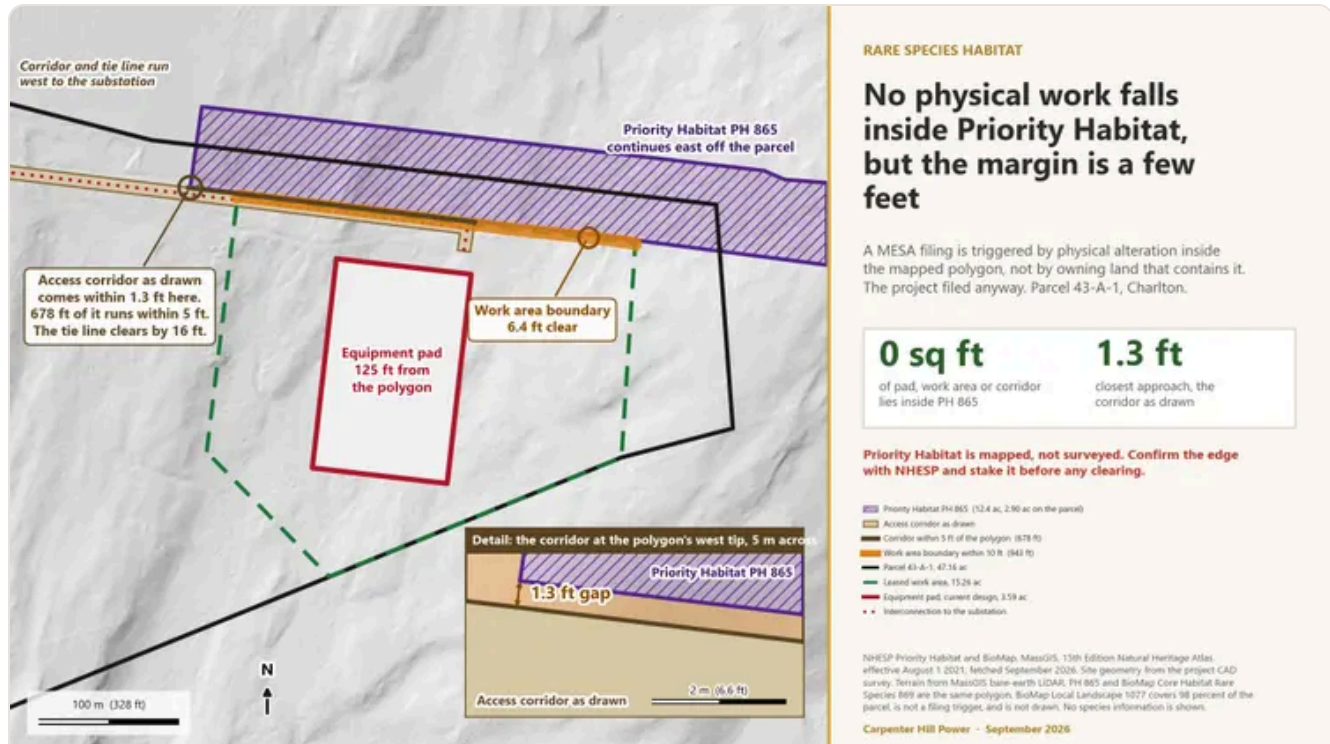


Figure 6. Rare species habitat and the work area. No physical work falls inside Priority Habitat, but the margin is a few feet.

NHESP Priority Habitat and BioMap, MassGIS, 15th Edition Natural Heritage Atlas effective August 1 2021, fetched September 2026. Site geometry from the project CAD survey. Terrain from MassGIS bare-earth LiDAR. PH 865 and BioMap Core Habitat Rare Species 869 are the same polygon. BioMap Local Landscape 1077 covers 98 percent of the parcel, is not a filing trigger, and is not drawn. No species information is shown.

- BioMap Local Landscape 1077 covers the whole work area, as it covers most of the surrounding upland. No BioMap Core Habitat or Critical Natural Landscape component touches the work area or the pad.
- No Estimated Habitat of Rare Wildlife lies within a mile; the nearest is 1.16 miles away. The nearest other Priority Habitat, PH 851, is 0.93 mile away.
- Vernal Pool Core 648 is 0.47 mile away, Wetland Core 3288 0.20 mile, and Aquatic Core 415 0.34 mile.
- The current design treats the PH 865 boundary as drawn as a no-disturbance line, staked by survey before any clearing. That reading is subject to NHESP's confirmation in the MESA review, which has not yet been filed.

NHESP asked on September 4, 2026 for a formal rare species information request as the first step, and it is being prepared for signature. No rare species information is shared without NHESP's written approval.

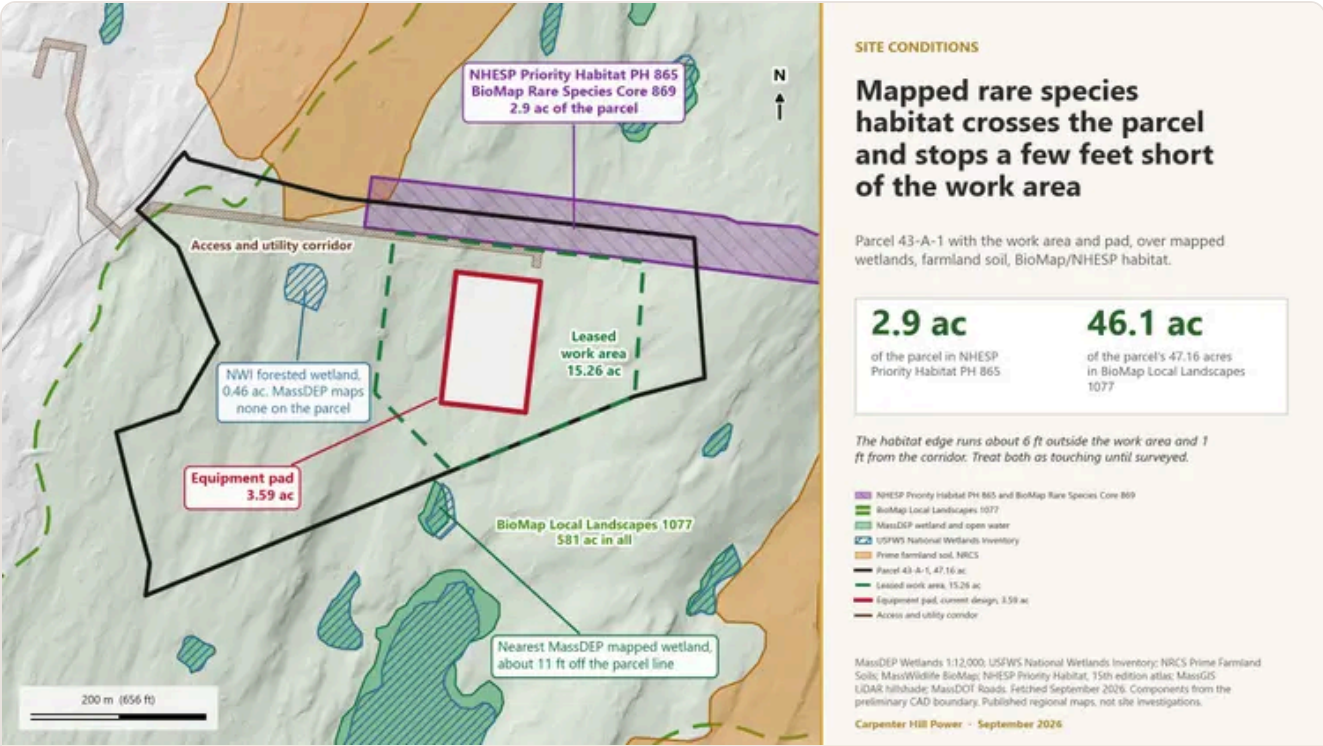


Figure 7. Environmental resources on and near the parcel: mapped habitat, wetlands, soils and the drawn components. MassDEP Wetlands 1:12,000; USFWS National Wetlands Inventory; NRCS Prime Farmland Soils; MassWildlife BioMap; NHESP Priority Habitat, 15th edition atlas; MassGIS LiDAR hillshade; MassDOT Roads. Fetched September 2026. Components from the preliminary CAD boundary. Published regional maps, not site investigations.

5.4 Agricultural resources: 0.0

The Agricultural Resource Index is zero across the 5.7-acre area, and the SSURGO soils explain why. The parcel is Charlton, Chatfield-Hollis-rock outcrop, Ridgebury and Paxton soils, all extremely stony or shallow, and none of it is farmed. The one prime farmland unit, 305B Paxton fine sandy loam, covers 0.56 acre at the parcel's north edge by the road. None of it is in the work area or the pad. The corrected boundary clips about 0.009 acre of it where the gen-tie easement meets the road, which is why the re-run is checked rather than assumed to return zero.

Soil map units on the parcel, from the NRCS SSURGO survey via MassGIS. A published soil map, not a site investigation: borings govern design.

Unit	Name	On the parcel	Farmland class
407B	Charlton fine sandy loam, 3 to 8 percent slopes, extremely stony	18.04 acres	Not prime
102C	Chatfield-Hollis-rock outcrop complex, 0 to 15 percent slopes	11.87 acres	Not prime

Unit	Name	On the parcel	Farmland class
407C	Charlton fine sandy loam, 8 to 15 percent slopes, extremely stony	8.36 acres	Not prime
71B	Ridgebury fine sandy loam, 3 to 8 percent slopes, extremely stony (poorly drained)	7.09 acres	Not prime
407E	Charlton fine sandy loam, 15 to 35 percent slopes, extremely stony	1.02 acres	Not prime
305B	Paxton fine sandy loam, 3 to 8 percent slopes	0.56 acre	All areas are prime farmland
1	Water	0.19 acre	Not prime

5.5 Climate change resilience: not scored by the tool

The state tool scores this criterion on sea level rise and storm surge, so its report for this site carries no climate page at all. That is a blank, not a zero, and this report does not present it as a score. Two facts stand in for it. FEMA's National Flood Hazard Layer places the entire parcel, work area and pad in Zone X, an area of minimal flood hazard, on FIRM panel 25027C0788F effective June 21, 2023; the nearest special flood hazard area is a Zone A about 0.2 mile away. And the state's Climate Resilience Design Standards Tool, run on September 4, 2026, confirms no exposure to sea level rise or storm surge while rating the site High Exposure for the two hazards that do apply inland.

Climate Resilience Design Standards Tool, version 1.5, Project 55250, run September 4, 2026.

Hazard	Exposure	Planning value	Where it goes in the design
Sea level rise and storm surge	None	Not applicable, about 35 miles inland	Nothing to design for
Extreme precipitation	High	10.7 inches in 24 hours for the 100-year storm by 2070	The stormwater design. The MEPA Office asked on September 4 that the design use this storm or document the departure.
Extreme heat	High	Up to 59 days a year above 90 degrees Fahrenheit by 2070	The equipment thermal specification and cooling design

5.6 Protected open space: no overlap

No protected or recreational open space in the MassGIS layer lies on the parcel or abuts it. The nearest is a private Agricultural Preservation Restriction 0.17 mile away, protected in perpetuity with no public access, and the corrected Facility Boundary comes within 373 feet of it without touching it. Eleven open space records lie within a mile, among them Prindle Lake Park at 0.64 mile, the Capin Hill Nature Sanctuary at 0.72 mile and the town

recreation fields at 0.73 mile. No Area of Critical Environmental Concern lies within 16 miles. The MassGIS layer carries no explicit Article 97 flag; on the usual proxy, publicly owned land protected in perpetuity, nothing on or next to the parcel qualifies.

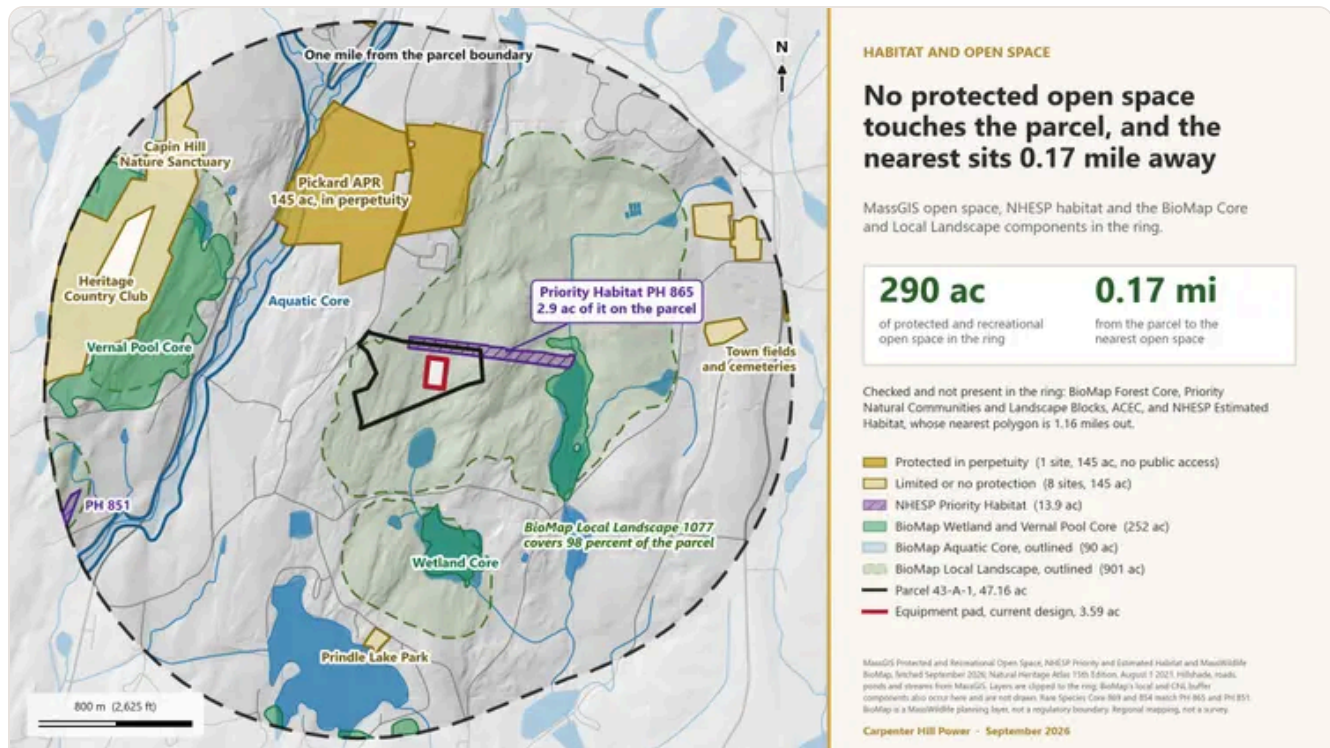


Figure 8. Protected open space and mapped habitat within a mile. No protected open space touches the parcel.

MassGIS Protected and Recreational Open Space, NHESP Priority and Estimated Habitat and MassWildlife BioMap, fetched September 2026; Natural Heritage Atlas 15th Edition, August 1 2021. Hillshade, roads, ponds and streams from MassGIS. Layers are clipped to the ring; BioMap's local and CNL buffer components also occur here and are not drawn. Rare Species Core 869 and 854 match PH 865 and PH 851. BioMap is a MassWildlife planning layer, not a regulatory boundary. Regional mapping, not a survey.

6 Beyond the six criteria: what the site screening found

The regulation says the six criteria do not limit what the Board looks at. The September 2026 screening on LiDAR terrain, published soils and the state layers turned up six findings that matter more to this site than any single score. Each is a desktop finding on published mapping, not survey, and each is paired with the study that answers it.

6.1 Soils under the pad

The equipment pad as drawn sits 76 percent on soil unit 71B, Ridgebury fine sandy loam: poorly drained, hydrologic group D, with a seasonal high water table within inches of the surface over dense till at about 19 inches. It is the parcel's only poorly drained unit, and it runs from the pad down the swale to the swamp. This was disclosed to the Citizen Advisory Committee on August 4, 2026. Geotechnical borings, test pits and piezometers are scheduled for September 2026; foundation, dewatering, recharge and any containment liner follow their results.

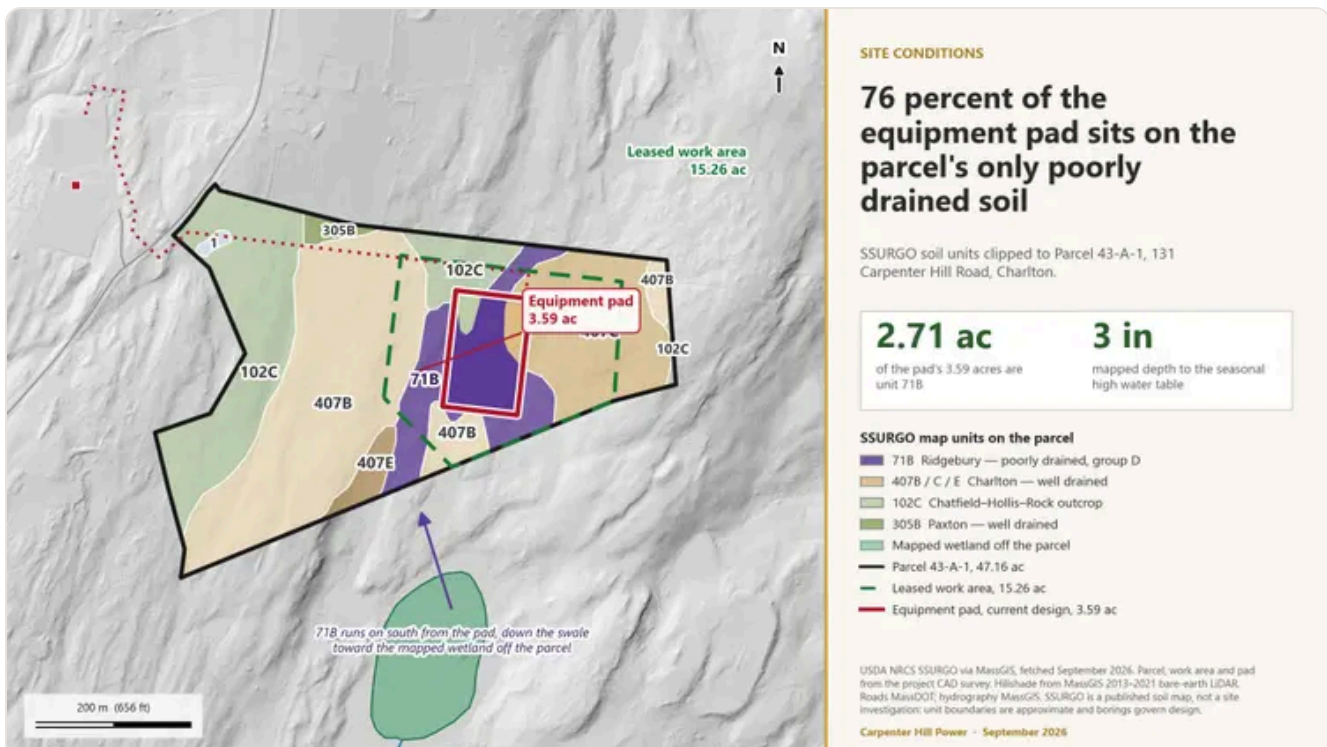


Figure 9. Site soils and the equipment pad. 76 percent of the pad sits on the parcel's only poorly drained soil.

USDA NRCS SSURGO via MassGIS, fetched September 2026. Parcel, work area and pad from the project CAD survey. Hillshade from MassGIS 2013–2021 bare-earth LiDAR. Roads MassDOT; hydrography MassGIS. SSURGO is a published soil map, not a site investigation: unit boundaries are approximate and borings govern design.

6.2 Where the water goes

Flow routing on the state's bare-earth LiDAR shows runoff leaving the pad at its southwest corner and running south, off the parcel after about 670 feet, into a 0.3-acre MassDEP-mapped shrub swamp about 307 feet from the pad edge, then down an unnamed stream toward McIntyre Pond about 1.3 miles away. Cady Brook, the Category 5 impaired stream that carries much of the block group's burden score, lies in a different drainage to the north. Above the pad, about 45.6 acres of hillside drain onto it, 13.4 of them on the parcel. That clean run-on has to be diverted around any containment before containment can work, and the diversion works, not the fence, are what set the width of the clearing.

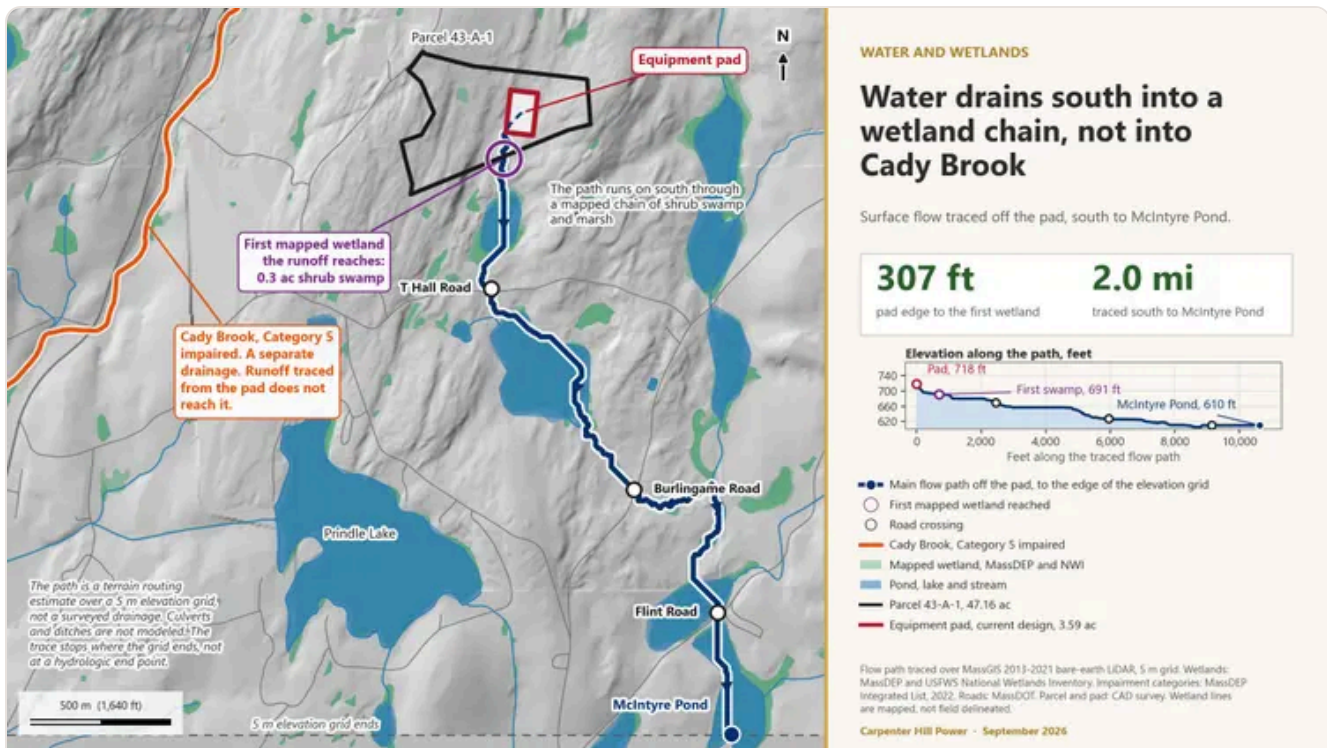


Figure 10. Where water leaving the pad goes: south into a wetland chain, not into Cady Brook.

Flow path traced over MassGIS 2013-2021 bare-earth LiDAR, 5 m grid. Wetlands: MassDEP and USFWS National Wetlands Inventory. Impairment categories: MassDEP Integrated List, 2022. Roads: MassDOT. Parcel and pad: CAD survey. Wetland lines are mapped, not field delineated.

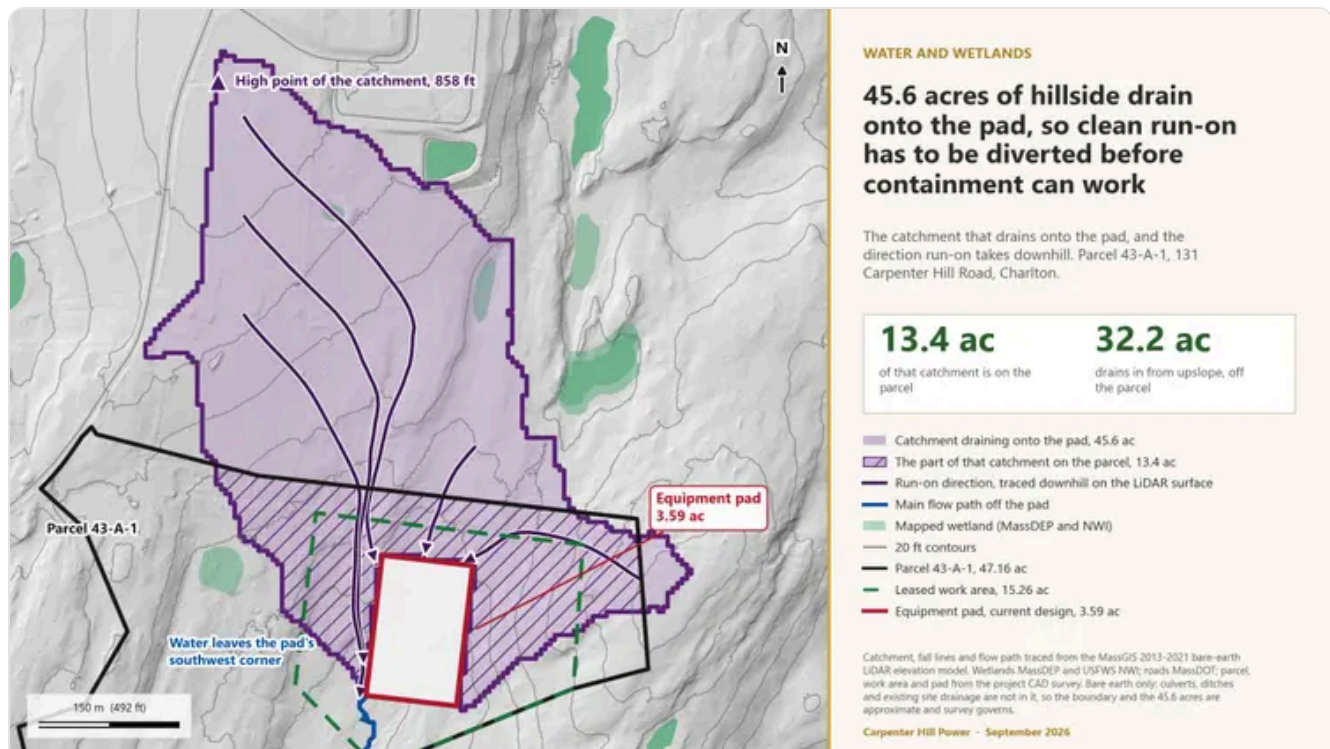


Figure 11. The 45.6-acre catchment draining onto the pad.

Catchment, fall lines and flow path traced from the MassGIS 2013-2021 bare-earth LiDAR elevation model. Wetlands MassDEP and USFWS NWI; roads MassDOT; parcel, work area and pad from the project CAD survey. Bare earth only: culverts, ditches and existing site drainage are not in it, so the boundary and the 45.6 acres are approximate and survey governs.

6.3 Wetlands and the buffer zone

MassDEP maps no wetland on the parcel; the nearest mapped shrub swamp is about 11 feet outside the parcel line. The National Wetlands Inventory maps 0.46 acre of forested wetland on the parcel, outside the work area and about 37 feet above the pad in elevation, so it is not a receptor. No wetland is filled. The 100-foot buffer zone under the Wetlands Protection Act reaches about 0.05 acre into the leased work area at its southern corner, and the interconnection route clips the buffer about 47 feet north of the substation. The pad itself is 292 feet clear. A wetlands specialist has walked the property; the formal field delineation is done this fall and filed with the Charlton Conservation Commission, with the Notice of Intent to follow.

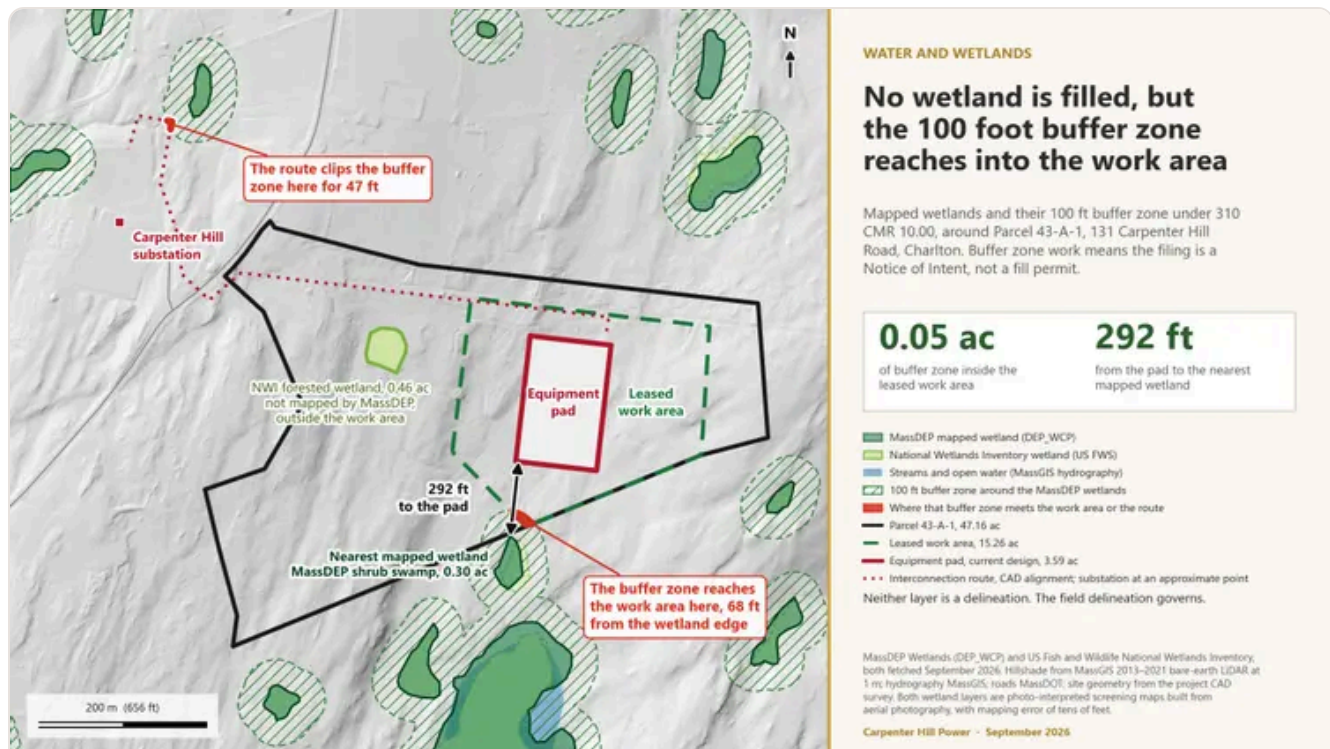
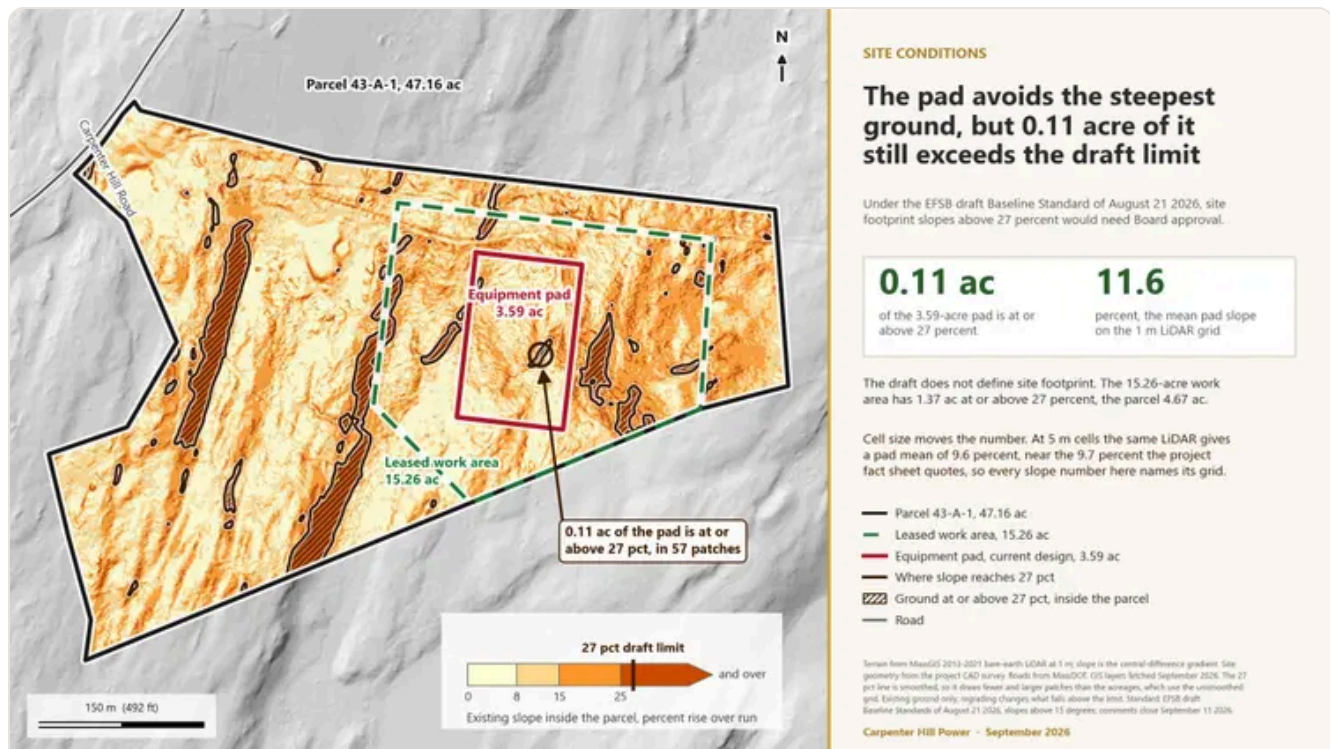


Figure 12. Wetlands, buffer zones and the work area. No wetland is filled, but the 100-foot buffer zone reaches into the work area.

MassDEP Wetlands (DEP_WCP) and US Fish and Wildlife National Wetlands Inventory, both fetched September 2026. Hillshade from MassGIS 2013–2021 bare-earth LiDAR at 1 m; hydrography MassGIS; roads MassDOT; site geometry from the project CAD survey. Both wetland layers are photo-interpreted screening maps built from aerial photography, with mapping error of tens of feet.

6.4 Slope against the draft standard

The parcel has about 137 feet of relief, from 688 to 825 feet. The Board's draft Baseline Standards, revised August 21, 2026, set a 27 percent slope limit and leave the term site footprint undefined. Measured on a 1-metre LiDAR grid, about 0.11 acre of the pad, 3.2 percent of it, sits at or above the limit; the work area carries 1.37 acres and the parcel 4.67 acres above it. The pad averages 9.7 percent slope on a 5-metre grid and 11.6 percent on a 1-metre grid, and the grid size changes the answer, so any slope figure should say which grid it came from. Grading design, with the stormwater design, addresses the 0.11 acre. Comments on the revised draft standards are due September 11, 2026.



6.5 Private wells

The MassDEP well database holds 87 records within about a mile: 61 with coordinates plus 29 addressed to Carpenter Hill Road, three in both sets. Domestic wells on the road run 175 to 665 feet deep, median 500 feet, all but one drilled into bedrock. A surface flow-routing screen on the LiDAR classifies the 71 records that can be placed: two domestic wells on T Hall Road, 0.39 and 0.45 mile away, sit downgradient in the pad's own drainage; the landowner's well is about 459 feet northwest and 44 feet above the pad; the Karl Storz public supply wells are about half a mile north with a ridge between. Sixteen Carpenter Hill Road records carry no street number and cannot be placed. The screen follows land surface, not fracture flow in the bedrock these wells draw from, and it does not say whether any well is or is not affected. This report makes no such statement. A door-to-door well survey within half a mile, to locate the unplaced records, has not yet started.

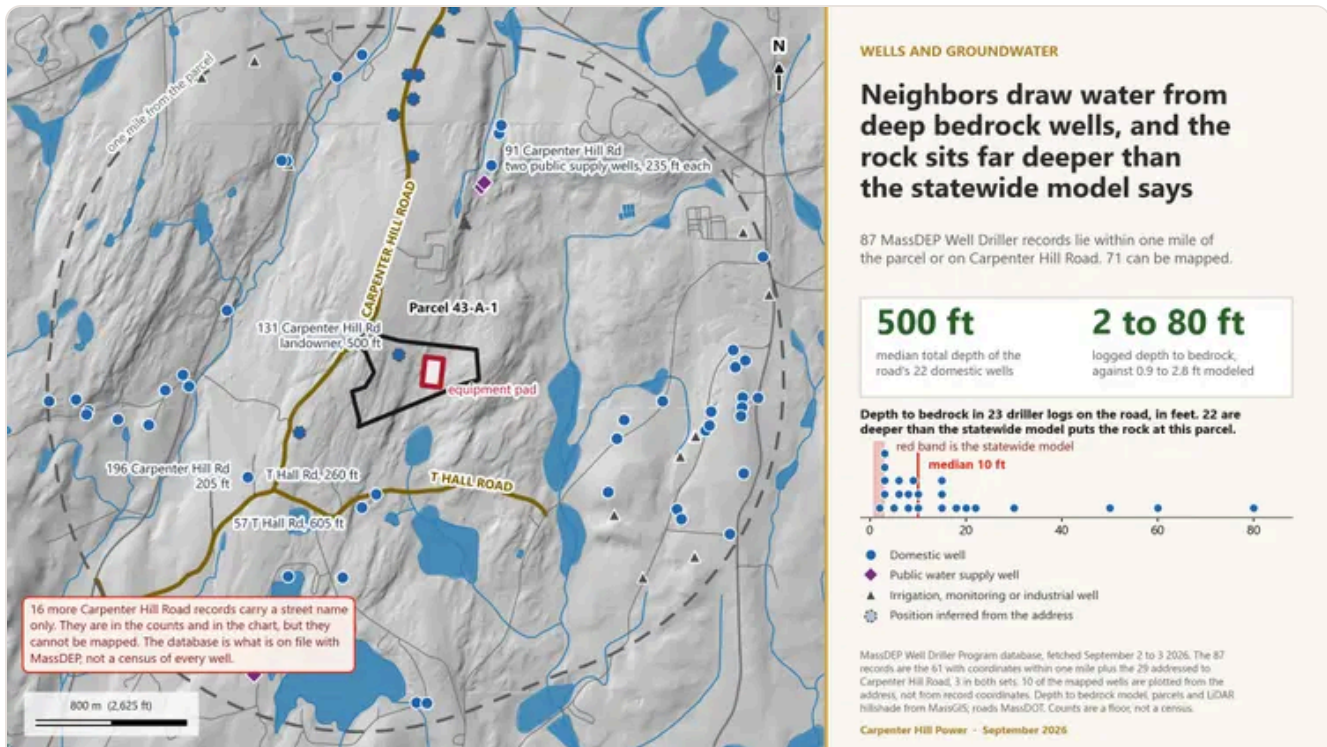


Figure 14. Recorded wells within a mile: depth, depth to bedrock and static water level.

MassDEP Well Driller Program database, fetched September 2 to 3 2026. The 87 records are the 61 with coordinates within one mile plus the 29 addressed to Carpenter Hill Road, 3 in both sets. 10 of the mapped wells are plotted from the address, not from record coordinates. Depth to bedrock model, parcels and LiDAR hillshade from MassGIS; roads MassDOT. Counts are a floor, not a census.

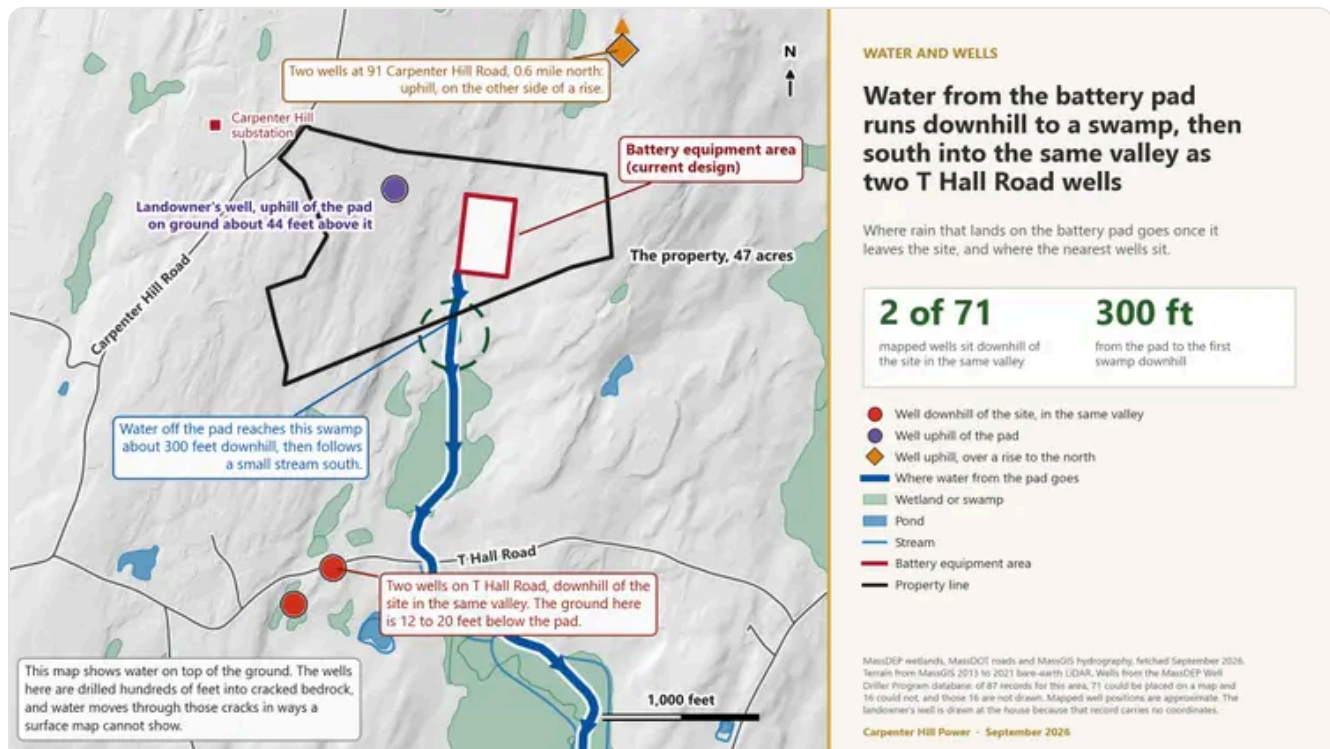


Figure 15. Where the water goes and where the wells are, drawn for residents.

MassDEP wetlands, MassDOT roads and MassGIS hydrography, fetched September 2026. Terrain from MassGIS 2013 to 2021 bare-earth LiDAR. Wells from the MassDEP Well Driller Program database: of 87 records for this area, 71 could be placed on a map and 16 could not, and those 16 are not drawn. Mapped well positions are approximate. The landowner's well is drawn at the house because that record carries no coordinates.

6.6 Historic resources, geology and public water supply

- Historic.** The Massachusetts Historical Commission inventory records no property on the parcel or in the work area. The nearest is the Isiah Putney House on Tinker Hall Road, built 1784, 0.27 mile away; the Charlton Center Historic District, listed on the National Register, is 0.79 mile away. The MHC Project Notification Form and tribal consultation have not yet been filed.
- Geology.** The whole parcel is mapped as thin till over bedrock, with bedrock outcrops within a few hundred feet. The statewide depth-to-bedrock model reads 1 to 3 feet at the parcel corners, while the well records nearby report bedrock from 2 to 80 feet down, so the model understates the till here and borings govern. Seismic soil class A, hard rock, at every sampled point. Quinebaug River basin.
- Public water supply.** No Zone II wellhead protection area lies within a mile. The nearest Zone I is the Karl Storz Endovision non-community supply, 0.49 mile away with a 231-foot radius; its interim wellhead protection area is 0.42 mile, or about 2,244 feet, from the parcel. No surface water supply watershed, sand and gravel aquifer or sole source aquifer touches the parcel. The parcel is in the Southbridge Water Department's mapped service area by 0.03 acre at its edge; the project uses no public water.
- Contamination.** No Chapter 21E site, activity and use limitation, landfill or groundwater discharge permit is on the parcel. The nearest tier-classified site is the closed Charlton Landfill on Flint Road, 0.75 mile away, which

lies outside the site's block group. Karl Storz Endovision, 0.10 mile away, is a MassDEP major facility as a hazardous waste generator.

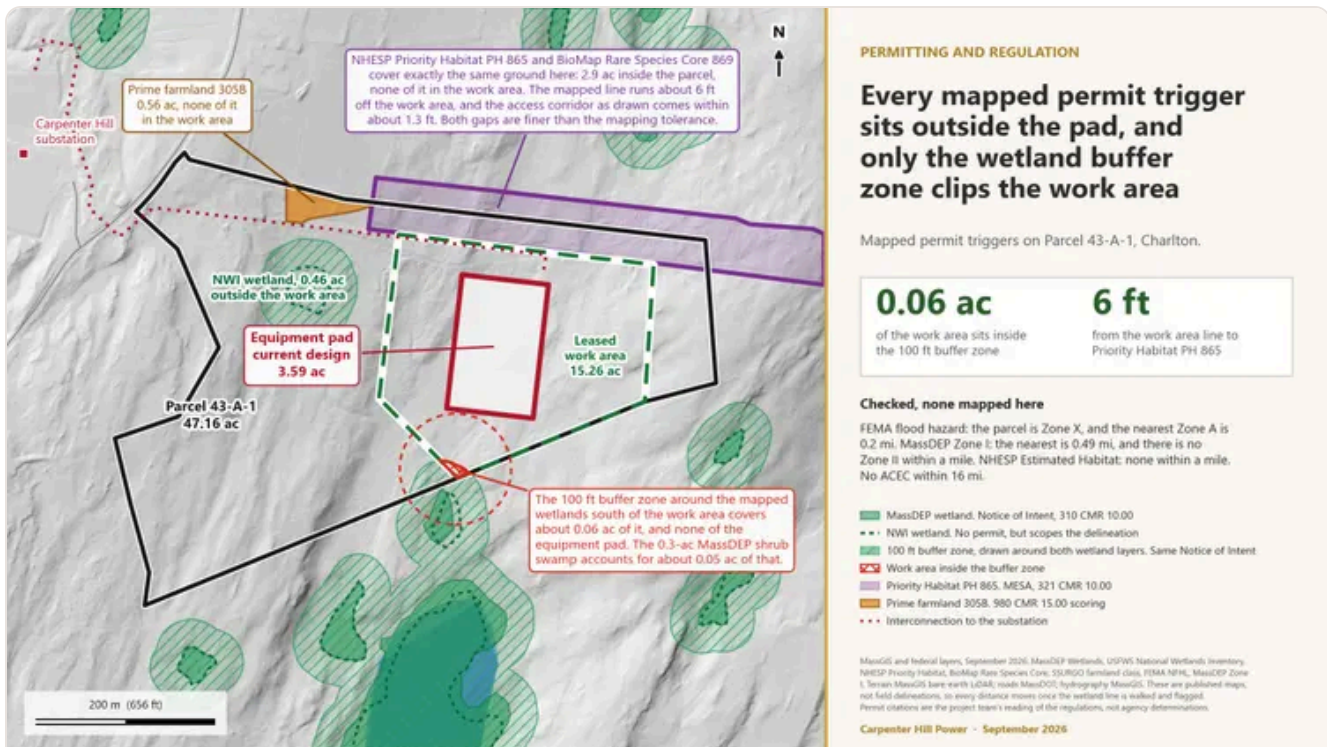


Figure 16. What triggers which permit, drawn on the site. Every mapped permit trigger sits outside the pad, and only the wetland buffer zone clips the work area.

MassGIS and federal layers, September 2026: MassDEP Wetlands, USFWS National Wetlands Inventory, NHESP Priority Habitat, BioMap Rare Species Core, SSURGO farmland class, FEMA NFHL, MassDEP Zone I. Terrain MassGIS bare-earth LiDAR; roads MassDOT; hydrography MassGIS. These are published maps, not field delineations, so every distance moves once the wetland line is walked and flagged. Permit citations are the project team's reading of the regulations, not agency determinations.

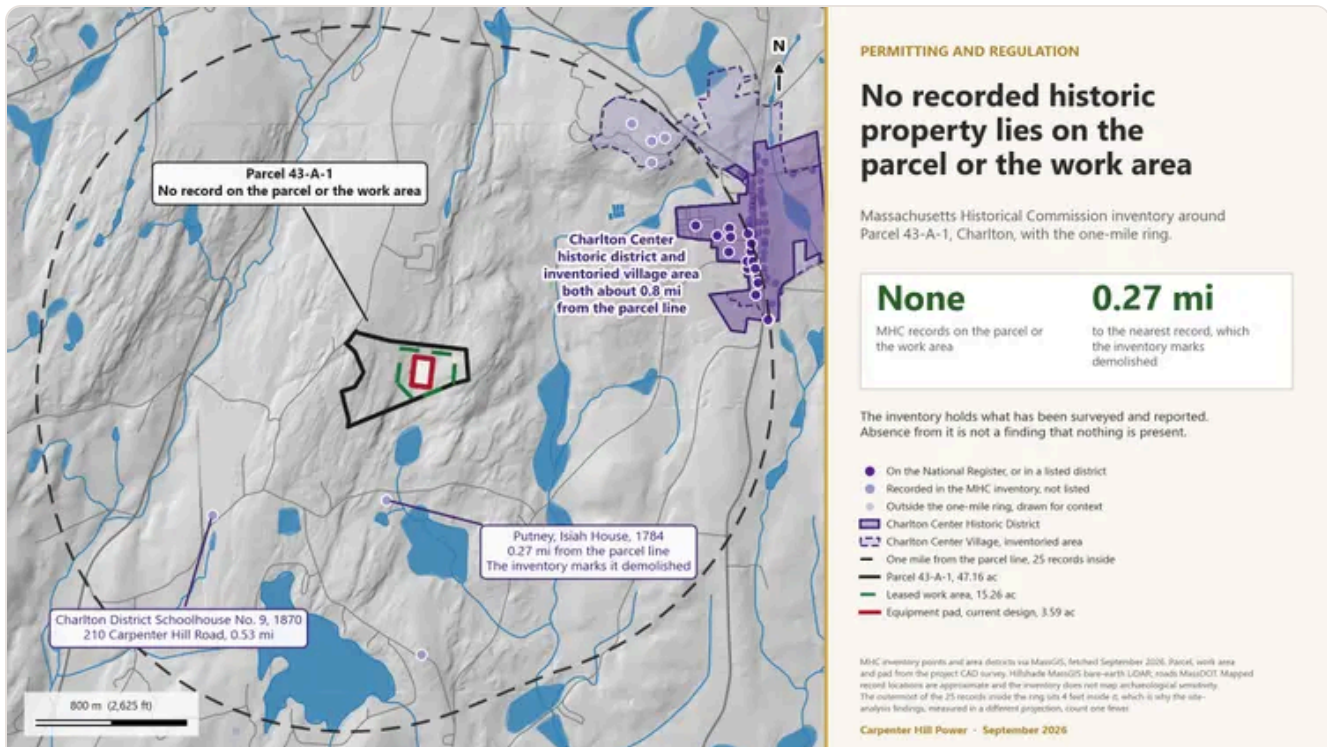


Figure 17. Mapped historic and cultural resources within a mile. None on the parcel.

MHC inventory points and area districts via MassGIS, fetched September 2026. Parcel, work area and pad from the project CAD survey. Hillshade MassGIS bare-earth LiDAR; roads MassDOT. Mapped record locations are approximate and the inventory does not map archaeological sensitivity. The outermost of the 25 records inside the ring sits 4 feet inside it, which is why the site-analysis findings, measured in a different projection, count one fewer.

980 CMR 16.09(1)(A)4 AND 16.04(1)(D)2

7 How the criteria shaped the site and the design

The siting rules ask the project to say how the site suitability criteria have been incorporated into choosing the site and shaping the design. The honest answer is in three parts: why this parcel, what the screening changed, and what is still open.

7.1 Why this parcel

The parcel sits beside the Carpenter Hill substation, where the 345 kV line built in 1967 meets the region's 115 kV lines. That adjacency is the reason for the site: the facility interconnects through a gen-tie of about 2,694 feet, most of it in an existing easement, rather than through new long-distance transmission. The Stantec Critical Issues Analysis of November 2023 screened the parcel before the lease was signed. The 2026 desktop screening on the state layers found no Area of Critical Environmental Concern within 16 miles, no Chapter 91 jurisdiction at this inland site, no overlap with protected open space, no land mapped as Article 97 on the usual proxy, no wetland on the parcel in the MassDEP layer, and the whole site in FEMA Zone X.

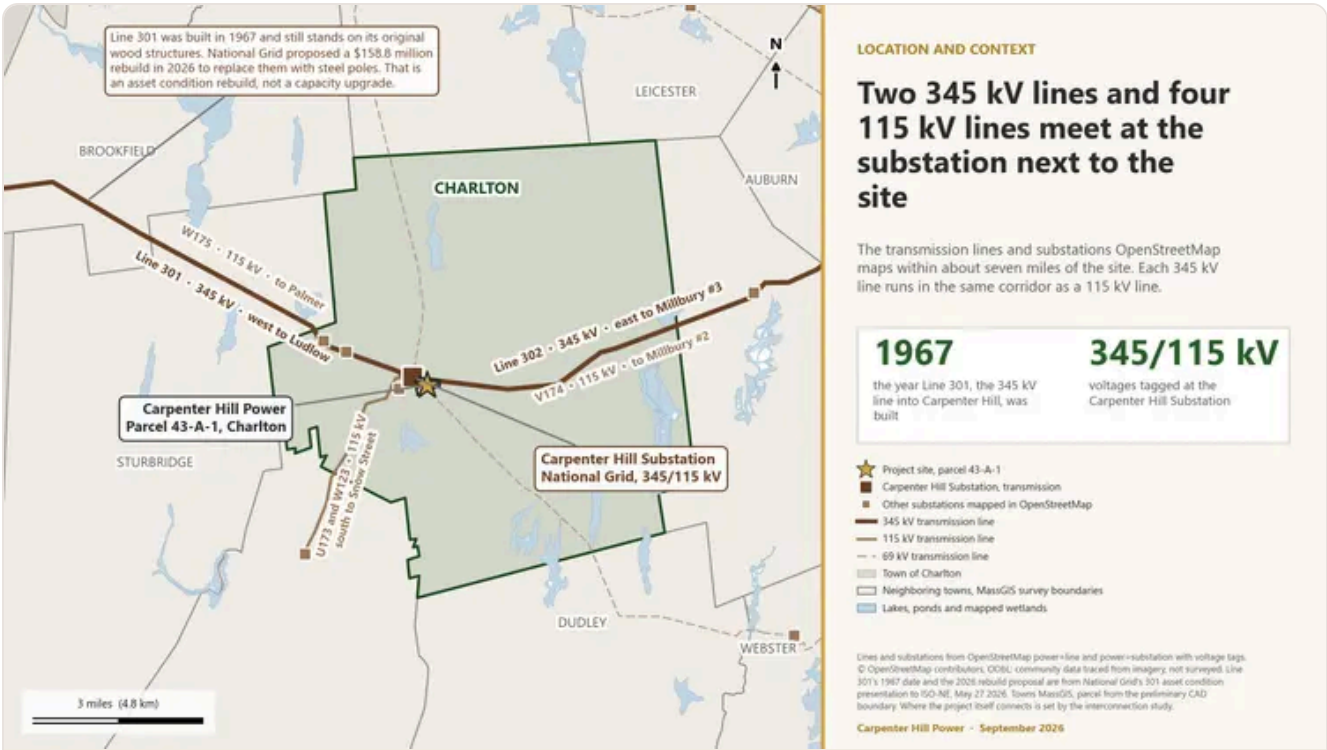


Figure 18. The transmission grid around the site. Two 345 kV lines and four 115 kV lines meet at the substation next to the site.

Lines and substations from OpenStreetMap power=line and power=substation with voltage tags, © OpenStreetMap contributors, ODbL; community data traced from imagery, not surveyed. Line 301's 1967 date and the 2026 rebuild proposal are from National Grid's 301 asset condition presentation to ISO-NE, May 27 2026. Towns MassGIS, parcel from the preliminary CAD boundary. Where the project itself connects is set by the interconnection study.

7.2 What the screening changed

Criterion or finding	What the current design does about it	Where it is recorded
Carbon and biodiversity: forest cover, habitat at the northwest edge	Total disturbance held at or under 10 acres of the 47-acre parcel; corridor clearing kept inside the 1.86-acre right of way; the PH 865 boundary treated as a no-disturbance line staked by survey before clearing, subject to NHESP's confirmation.	Commitment Tracker; plans filed with the Application; MESA review
Layout	The layout moved from Megapack 2 XL to Megapack 3 and from 156 to 136 units, which shrank the equipment area. Design changes and the reasons for them are logged on this site.	Commitment Tracker, alternative designs
Soils and run-on	Foundation, dewatering and recharge design follow the borings. Post-construction runoff held at today's rate; the 45.6 acres of run-on diverted around any containment; a catchment swale along the southern boundary in the current design.	Stormwater design; Commitment Tracker

Criterion or finding	What the current design does about it	Where it is recorded
Wetland buffer	Setbacks from delineated resource areas; no wetland fill; the 0.05-acre buffer overlap is what the Notice of Intent covers.	ANRAD and Notice of Intent to the Charlton Conservation Commission
Climate: precipitation and heat	The 2070 100-year storm and the heat projections are inputs to the stormwater design and the equipment thermal specification.	Stormwater design; Application
Burdens score	Cannot be changed by design. Answered by the Cumulative Impact Analysis and the Community Benefits Plan, with required mitigation listed separately and not counted as a benefit.	Cumulative Impact Analysis; draft Community Benefits Plan

7.3 Alternatives on the parcel

The MEPA Office recommended on September 4, 2026 an environmental alternatives analysis covering siting and design alternatives that reduce footprint and clearing, in addition to the battery technology alternatives already considered. That analysis is scoped for the Application. Ahead of it, a desktop search of the whole parcel was run in September 2026 to ask where a pad could go and how the drawn location compares. It holds the recorded New England Power transmission easement along the north line clear, since its deeds bar structures and any change of grade, and it scores every placement on run-on, slope, poorly drained soil, forest cover, distance to the substation and distance to the nearest dwelling. [Its finding, that with the easement held clear the drawn pad is the best location for a pad of its size and that only a smaller pad or two smaller pads would reduce run-on and poorly drained soil, is under review by the project engineer and is not yet part of the design record.]

7.4 Studies complete, in progress and not started

COMPLETE

Critical Issues Analysis (Stantec, November 2023)

Site Suitability Mapping Tool run, July 17, 2026, on a 5.7-acre site area

MassEnviroScreen block group analysis, February 27, 2026 build

Terrain, soils and drainage analysis, September 3, 2026

Well gradient screen and well inventory within one mile, September 3, 2026

Wellhead protection desktop screen and ACEC check, September 2, 2026

Climate Resilience Design Standards Tool run, September 4, 2026

One-mile landmark map, two sheets, posted

IN PROGRESS

Re-run of the Site Suitability Mapping Tool on the 17.29-acre Facility Boundary, before the Pre-filing Notice

Cumulative Impact Analysis Report

Stormwater design

Emergency Action Plan with the Charlton Fire Department, independently reviewed

Fire water source decision with the Charlton Fire Department

Sound study against the MassDEP noise policy (initial screening under way)

Viewshed or visual impact assessment (preliminary viewshed complete)

NOT STARTED, OR OPEN

Geotechnical borings, test pits and piezometers, September 2026

Field wetland delineation, this fall, then ANRAD and Notice of Intent

MESA project review with NHESP; rare species information request being prepared for signature

Door-to-door well survey within half a mile

Environmental alternatives analysis for the Application

Traffic plan with Charlton DPW

Fire protection engineering report and hazard mitigation analysis; smoke and toxic gas plume dispersion analysis

MHC Project Notification Form; tribal consultation

Landscaping and lighting plans; magnetic field analysis; SF6 determination; SPCC Plan

FAA obstruction evaluation; Clean Water Act Section 404 applicability

8 ^{980 CMR 15.10(2) TO (5)} What happens next

The provisional scores become anticipated scores on the correct boundary before the Pre-filing Notice, and final scores when the Site Suitability Report is filed with the Application. Between now and then, anyone can question them.

When	What	What it produces
September 4, 2026	Interagency consultation convened by DPP	The provisional scores, the boundary correction and the site findings presented to state agencies. Done.
September 10, 2026	Citizen Advisory Committee meeting 3, virtual, 7:00 to 8:30 PM	The scores and this report shared with the committee.
September 30, 2026	Second public meeting, Dexter Hall, Charlton Public Library, 12:15 to 1:15 PM and 6:30 to 8:00 PM	The scores shared with the public. Questions recorded on the Engagement Log.
Fall 2026	Borings, field wetland delineation, MESA request, alternatives analysis	The field results Section 6 waits on.
Before December 2026	Re-run of the Site Suitability Mapping Tool on the 17.29-acre Facility Boundary	Anticipated scores on the correct boundary. This report is reissued with them and the prior version stays published.
December 2026	Pre-filing Notice to DPP, the Board and the permitting agencies	The anticipated scores in the record. Agencies have 30 days to comment.
February to March 2027	Application for a Consolidated Permit	The Site Suitability Report filed under 980 CMR 15.10(3). Scores become final.

How to question a score

Under 980 CMR 15.10(4), the project, the Town of Charlton or any Key Stakeholder who believes a score was calculated on materially erroneous, incomplete or faulty data may ask the Director of the Siting Board for a score revision, in the form the Director prescribes. The request has to name the specific deficiency. The Director decides within 30 days, and a revised score is final subject to any modifier. If you think a number in this report is wrong, tell us first, at the contact below, and we will check it and say what we found on the Engagement Log. That does not replace your right to go to the Director.

9 Sources, methods and terms

Every number in this report traces to a named source with a date. Where a number is a desktop measurement on published mapping rather than a survey, it says so.

Clean Energy Infrastructure Site Suitability Report	Output of the official Site Suitability Mapping Tool, Executive Office of Energy and Environmental Affairs, run July 17, 2026 on a 5.7-acre site area. Six pages: cover with the four scores, carbon, biodiversity, agricultural resources, social and environmental burdens, protected open space. The output carries no climate change resilience page. Available on request.
980 CMR 15.00	Cumulative Impact Analysis and Standards for Applying Site Suitability Criteria, Energy Facilities Siting Board, effective May 8, 2026, applying to applications filed on or after July 1, 2026.
Site plan G101 revision 16	June 10, 2026. Components measured from the matching CAD export; the title block figures are recorded alongside and the differences are being reconciled with the project engineer.
MassGIS and federal layers	Pulled September 2 to 3, 2026: SSURGO soils and prime farmland, MassDEP wetlands, National Wetlands Inventory, FEMA National Flood Hazard Layer, NHESP Priority and Estimated Habitat, MassWildlife BioMap, Protected and Recreational Open Space, ACEC, wellhead protection Zone I, Zone II and IWPA, 2016 land cover, MHC inventory, surficial geology, Chapter 21E sites, AUL sites, major facilities, landfills, water and sewer service areas, census block groups and MassEnviroScreen (February 27, 2026 build).
Terrain	MassGIS 2013 to 2021 bare-earth LiDAR, 0.5-metre tiles, used at 1-metre and 5-metre grids. Slope by Horn's method. Flow routing by priority-flood pit filling and D8 direction. Bare earth only: culverts and existing site drainage are not in it.
Wells	MassDEP Well Driller Program database, fetched September 2 to 3, 2026. Hand-entered records back to 1962; coordinates required only for about the last 15 years, so counts are a floor, not a census.
Climate Resilience Design Standards Tool	Version 1.5, Project 55250, run September 4, 2026.

Draft Baseline Standards	Energy Facilities Siting Board, revised draft of August 21, 2026, comments due September 11, 2026. The 27 percent slope limit is a draft standard.
Critical Issues Analysis	Stantec, November 2023. In the Document Library.

Terms used in this report

Criteria-specific Suitability Score

The score for one criterion, 0.0 most suitable to 5.0 least suitable, produced by the state's Site Suitability Mapping Tool for a site footprint (980 CMR 15.02).

Facility Boundary

The outermost boundary of the project site, such as the outermost area of construction or disturbance or the fence line, and for a linear component the edge of the right of way (980 CMR 15.02).

Site Suitability Mapping Tool

The state's web mapping tool, maintained by the Executive Office of Energy and Environmental Affairs, that calculates the scores for a drawn site footprint.

Site Suitability Report

The written report of the scores, any modifiers sought, and supporting documentation, filed with the Application (980 CMR 15.10(3)).

Large Clean Energy Storage Facility

A clean energy storage facility above the size threshold in 980 CMR 1.01, which places it under the Siting Board's consolidated permit.

MassEnviroScreen

The state's screening tool that scores every census block group on 30 indicators of environmental exposure, environmental effects, climate risk, sensitive populations and socioeconomic factors.

Burdened Area

A census block group with a MassEnviroScreen score of 75 or more, or a median household income of 65 percent or less of the state median (980 CMR 15.04(1)).

Priority Habitat

Land mapped by the Natural Heritage and Endangered Species Program as habitat of state-listed rare species, where work is reviewed under the Massachusetts Endangered Species Act.

Zone X, Zone A

FEMA flood zones. Zone X is minimal flood hazard; Zone A is a special flood hazard area with a one percent annual chance of flooding.

Run-on

Rainwater that flows onto the pad from the hillside above it, as opposed to rain that falls on the pad.

Downgradient

Lower along the direction water moves. In this report it is judged from the land surface, not from a groundwater model.

Request for Score Revision

A request to the Director of the Siting Board to revise a score calculated on faulty data (980 CMR 15.10(4)).

Questions about this report

Jonathan Santiago, Project Development Associate, ESA Solar. jsantiago@esa-solar.com or 407-232-7440 ext. 251.

Translation, interpretation, or another accommodation for any meeting about this report is available on request.

The live version of this report, the slides, every map in it at full size, the Commitment Tracker, the Engagement Log, and every document it rests on are at carpenterhillpower.com/reports/site-suitability. When a version of this report is replaced, the old one stays readable, with the date it changed and the reason.

RELATED

Cumulative Impact Analysis: carpenterhillpower.com/reports/cumulative-impact

Slide Library: every map in this report at full size: carpenterhillpower.com/slide-library

How We Follow the Siting Rules: carpenterhillpower.com/siting-rules

Commitment Tracker: carpenterhillpower.com/commitments

Document Library: carpenterhillpower.com/documents

Carpenter Hill Power, LLC · 131 Carpenter Hill Road, Charlton, Massachusetts · Preliminary draft v0.1 · September 8, 2026

Cumulative Impact Analysis

Whether the project adds to the burdens the host block group already carries: the Specific Geographical Area, the Burdened Area it intersects, the 16 Elevated Indicators, and the project's effect on each.

Preliminary draft · v0.1

September 8, 2026

5 open items

This is the preliminary draft the project shares with Key Stakeholders during pre-filing under 980 CMR 15.03(6). Every determination in it is preliminary and says what it depends on. The final CIA Report is filed with the Application, expected in early 2027, and every version of this report stays published.

Carpenter Hill Power, LLC. Docket: Not yet assigned (pre-filing). Prepared by Wes Shaffer, AICP, Director of Planning and Engagement, ESA Solar, on behalf of Carpenter Hill Power, LLC. The live version, the slides and every document this report rests on are at carpenterhillpower.com/reports/cumulative-impact.

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WHAT THIS REPORT FOUND

1. The one-mile Specific Geographical Area intersects one Burdened Area, block group 250277561012, which scores 80.9 on MassEnviroScreen against a threshold of 75 and contains every component of the project.
2. Sixteen of the block group's 29 scored indicators are Elevated Indicators. The score is carried by legacy contamination and impaired streams around the block group, none of it on the parcel.
3. Preliminary finding: the project is not expected to materially exacerbate any Elevated Indicator in construction or operation, so no Disproportionate Adverse Effect is identified. The finding is conditional on the fire protection, sound and stormwater studies.
4. The neighbouring block group, scoring 73.0, is analysed voluntarily, and residents of it can petition for a full analysis.

Text in [square brackets] is a decision or a fact that is not settled yet. There are 5 of them in this draft.

WHAT A CUMULATIVE IMPACT ANALYSIS IS, AND WHAT THIS ONE FOUND SO FAR

1 Summary

A Cumulative Impact Analysis asks one question in five steps: does this project add to burdens a community already carries? The site sits in a census block group the state has designated a Burdened Area, so every step applies. This working draft records the steps taken, the preliminary answer to each, and what still has to happen before the answer is final.

1 mile

Specific Geographical Area for a clean energy storage facility, measured from the 17.29-acre Facility Boundary

80.9

MassEnviroScreen score of the host block group. Burdened Area threshold: 75

16 of 29

Indicators above the 50th percentile in the host block group, so Elevated Indicators

0

Disproportionate Adverse Effects identified, preliminary and conditional on open studies

The 2024 Climate Act requires an applicant for an energy facility to assess the existing environmental burdens and public health consequences in the area around a proposed site, and, where that area is subject to an unfair or inequitable burden, to identify any impact of the project that would likely result in a disproportionate adverse effect, any impact that would increase or reduce the effects of climate change, and the remedial actions proposed for either. 980 CMR 15.00 sets the method. The Office of Environmental Justice and Equity's Standards and Guidelines for Cumulative Impact Analysis, April 2026, sets the standard. This report follows the Board's CIA Report Template, part by part, so that the filed version can be checked against this one.

The five steps of 980 CMR 15.03, and where this analysis stands on each.

Step	Rule	Result so far
1. Identify the Specific Geographical Area	15.05(1)	One mile from the 17.29-acre Facility Boundary. Section 2.
2. Does it intersect a Burdened Area?	15.04, 15.05(2)	Yes. Block group 250277561012, score 80.9. The analysis continues. Section 3.
3. Which indicators are elevated?	15.06	Sixteen of 29. Section 4.
4. Does the project materially exacerbate any of them?	15.07	Preliminary: no, in either phase. Conditional on the studies listed in Section 9. Sections 5 and 6.
5. Remedial actions	15.08	None required by a finding. The firm commitments that keep the answer at no are listed anyway. Section 7.

HOW TO READ THIS DRAFT

This is the analysis 980 CMR 15.03(6) asks the project to share with Key Stakeholders during pre-filing. It is not the filed report. Every determination in Sections 5 and 6 is preliminary and says what it depends on. The state's own guidance says MassEnviroScreen is a starting point to be supplemented with community input and local information; Section 10 says what residents have told us and how to add to it. Text in square brackets is a decision or a fact that is not settled.

2 The Specific Geographical Area

The Specific Geographical Area, or SGA, is the ground the analysis examines. It is drawn as a fixed distance from the Facility Boundary, and the distance depends on the kind of facility. For a clean energy storage facility it is one mile.

Table 1. Proposed sites or routes.

Site or route type	Address and description
Proposed	Assessor parcel 43-A-1, 131 Carpenter Hill Road, Charlton, Massachusetts, 47.13 acres, with a gen-tie easement extending about 1,142 feet beyond the parcel to the Carpenter Hill substation. A 136-unit lithium iron phosphate battery energy storage facility on a fenced pad inside a 15.26-acre leased work area, connecting to the substation through a 2,694-foot gen-tie. Full description in the Application.
Noticed alternative	None. The project proposes one site.
Noticed variation	None.

Table 2. The Facility Boundary and how it meets the 980 CMR 15.02 definition.

Site or route type	Map	Facility Boundary and compliance with the definition
Proposed	Figure 1	One merged polygon of 17.29 acres measured from site plan G101 revision 16 (June 10, 2026): the 15.26-acre BESS project area, which is the outermost limit of construction activity and disturbance around the fenced pad; the 1.86-acre gen-tie easement, 2,694 feet by 30 feet, taken at the edge of the right of way as the definition requires for a linear component; and the 0.55-acre access driveway from Carpenter Hill Road, which is ground disturbance outside both. The title block on the plan reads 16.57 acres and leaves the driveway out; the larger, more inclusive boundary is used here. [Easement width of 30 feet as drawn, against 25.3 feet implied by the title block, being confirmed with the project engineer.]

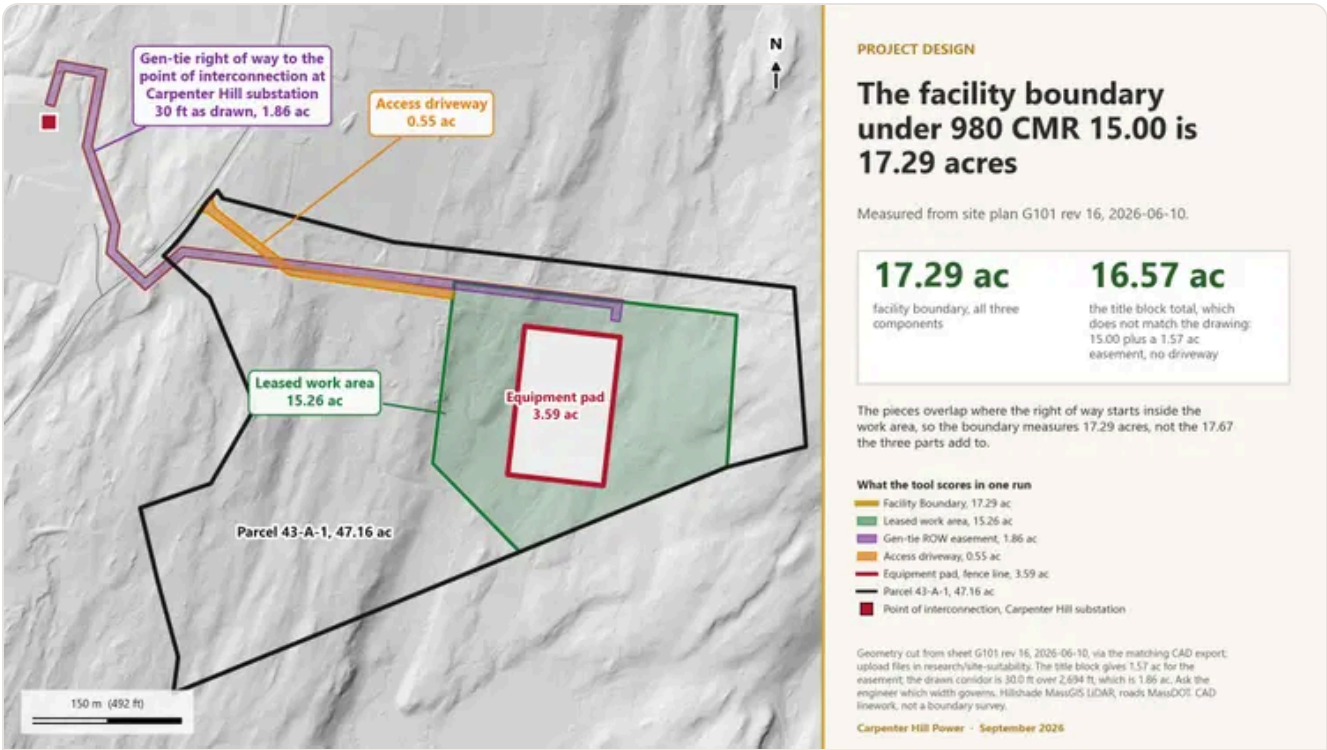


Figure 1. The 17.29-acre Facility Boundary the SGA is measured from.

Geometry cut from sheet G101 rev 16, 2026-06-10, via the matching CAD export; upload files in research/site-suitability. The title block gives 1.57 ac for the easement; the drawn corridor is 30.0 ft over 2,694 ft, which is 1.86 ac. Ask the engineer which width governs. Hillshade MassGIS LiDAR, roads MassDOT. CAD linework, not a boundary survey.

Table 3. Facility types and the radial distance from the Facility Boundary that sets the SGA (980 CMR 15.05(1)(b)).

Facility type	Applies here?	Radial distance
Clean Energy Storage Facility (LCESF)	Yes, the whole project	1 mile
Transmission and distribution line	Not as a separate facility. The gen-tie is a component of the storage facility inside its Facility Boundary; the one-mile distance is applied to it as well, which is the more inclusive reading. [Reading to be confirmed with DPP.]	(0.25 mile, if it applied)
Substation	No. The project connects to an existing substation and builds none.	(0.5 mile, if it applied)

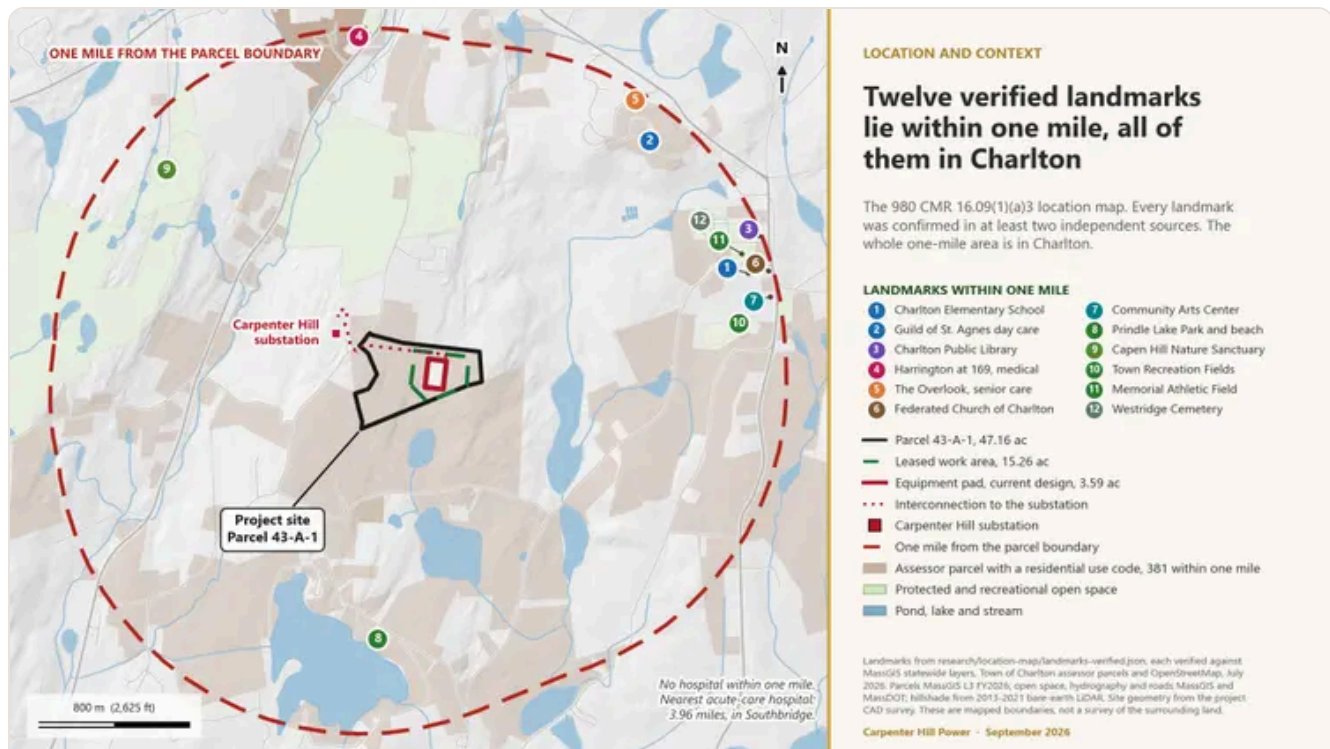


Figure 2. The project location and the landmarks within one mile, all of them in Charlton.

Landmarks from research/location-map/landmarks-verified.json, each verified against MassGIS statewide layers, Town of Charlton assessor parcels and OpenStreetMap, July 2026. Parcels MassGIS L3 FY2026; open space, hydrography and roads MassGIS and MassDOT; hillshade from 2013-2021 bare-earth LiDAR. Site geometry from the project CAD survey. These are mapped boundaries, not a survey of the surrounding land.

Explanatory comments. The one-mile ring measured from the Facility Boundary encloses about 2,770 acres, and it lies entirely within the Town of Charlton; no other municipality's boundary is inside it. Measured from the parcel boundary instead, the ring encloses about 2,840 acres and adds no block group. The block-group analysis in Section 3 was run both ways and reaches the same result.

3 Burdened Areas intersecting the SGA

A Burdened Area is a census block group with a MassEnviroScreen score of 75 or more, or a median household income of 65 percent or less of the state median. Three block groups lie inside the one-mile SGA. One of them qualifies, and it is the one the whole project sits in.

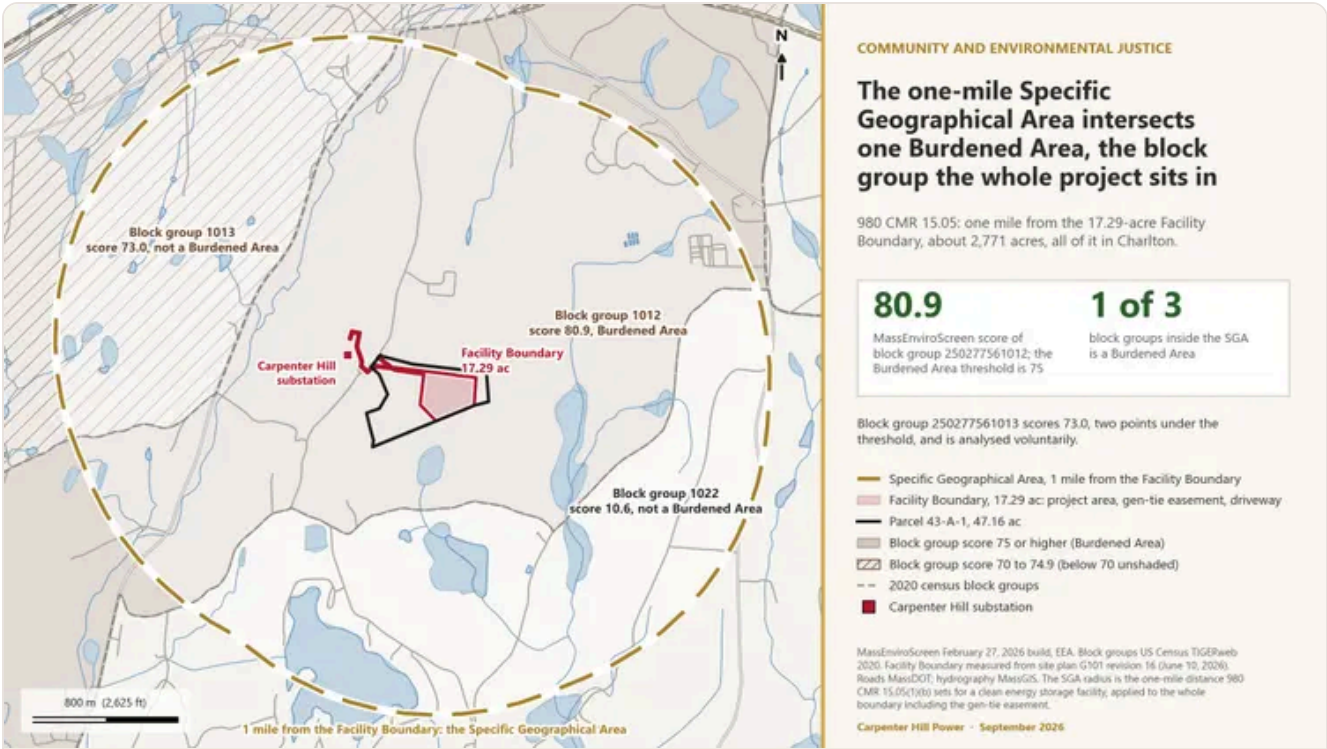


Figure 3. Table 4 attachment. The Facility Boundary, the one-mile SGA, and the block groups it intersects, shaded by MassEnviroScreen score.

MassEnviroScreen February 27, 2026 build, EEA. Block groups US Census TIGERweb 2020. Facility Boundary measured from site plan G101 revision 16 (June 10, 2026). Roads MassDOT; hydrography MassGIS. The SGA radius is the one-mile distance 980 CMR 15.05(1)(b) sets for a clean energy storage facility, applied to the whole boundary including the gen-tie easement.

Table 5. Census block groups within one mile of the Facility Boundary. MassEnviroScreen February 27, 2026 build.

Block group	Score	Burdened Area?	Position and how it is treated
250277561012 (Block Group 2, Tract 7561.01)	80.9	Yes, on the score	Contains the parcel, the pad, the driveway and the whole gen-tie easement including its off-parcel length. About 1,450 acres of its 2,525 acres lie inside the SGA. Analysed as 980 CMR 15.06 and 15.07 require.

Block group	Score	Burdened Area?	Position and how it is treated
250277561013 (Block Group 3, Tract 7561.01)	73.0	No	Inside the SGA, about 0.34 mile from the Facility Boundary at its nearest point, and about two points under the threshold. Analysed voluntarily in Section 4; Elevated Indicators there carry no legal status under 980 CMR 15.02.
250277561022	10.6	No	Inside the SGA, about 0.30 mile from the Facility Boundary at its nearest point. Not analysed further.

Explanatory comments. Block group 250277561023, scoring 19.7, lies about 1.04 miles from the Facility Boundary and does not intersect the SGA. The host block group is the only Burdened Area in Charlton. It qualifies under 980 CMR 15.04(1)(a) on its score; its median household income of about 82 percent of the state median does not trip the 65 percent test in 15.04(1)(b). It is not an environmental justice population under the state's separate definition, and this analysis is not an environmental justice screening: 980 CMR 15.00 uses MassEnviroScreen and the Burdened Area test, and nothing else. Because about 1,142 feet of the gen-tie easement runs outside parcel 43-A-1, the check was run on every parcel that hosts a project component; every one falls in the same block group. Under 980 CMR 15.04(5) the analysis relies on the indicator data current when the pre-filing period began on April 9, 2026, which the project understands to be the February 27, 2026 build, [to be confirmed with DPP] . Because the SGA intersects a Burdened Area, the analysis continues under 15.05(3) rather than concluding.

CIA REPORT TEMPLATE PART III; 980 CMR 15.06

4 Elevated Indicators

MassEnviroScreen scores every block group on 30 indicators, each as a percentile against every other block group in the state. For a clean energy facility, an indicator above the 50th percentile is an Elevated Indicator, and the project has to assess its effect on each one. The host block group has 16.

Table 6. Statewide percentile values for each indicator. Elevated Indicators, above the 50th percentile, are marked. Only the host block group's marks have legal effect under 980 CMR 15.02; the neighbouring block group is shown voluntarily. MassEnviroScreen February 27, 2026 build.

Indicator	250277561012 Block Group 2, Tract 7561.01 (host, Burdened Area)	250277561013 Block Group 3, Tract 7561.01 (voluntary, not a Burdened Area)
ENVIRONMENTAL EXPOSURES		
Fine particulate matter (PM2.5) 6.58 micrograms per cubic metre in both block groups	54.2	54.2
Ozone	49.9	49.9
Nitrogen dioxide (NO2)	14.7	21.2
Diesel particulate matter	16.6	24.4
Drinking water non-compliance The host block group is mapped to the Southbridge Water Department; nearly every home in it is on a private well	0.0	61.6
Air toxics cancer risk	21.2	19.8
Air toxics respiratory hazard index	16.7	16.7
Proximity to heavy traffic	13.0	21.0
ENVIRONMENTAL EFFECTS		
Pollution cleanup sites	90.8	98.4
Groundwater threats	88.4	98.9
Hazardous waste generators and facilities	81.4	89.4
Solid waste sites and facilities	85.6	0.0
Impaired water bodies Four pollutant listings in the host block group, five in the neighbour	83.7	89.3
CLIMATE RISKS		

Indicator	250277561012 Block Group 2, Tract 7561.01 (host, Burdened Area)	250277561013 Block Group 3, Tract 7561.01 (voluntary, not a Burdened Area)
Drought	40.4	40.4
Wildfire risk	77.6	53.5
Flood risk 0.4 percent of the host block group's buildings are in a flood zone	54.3	64.2
Extreme heat days	18.3	18.2
SENSITIVE POPULATIONS		
Pediatric asthma	57.0	25.6
Low birth weight infants The state publishes no value for either block group	No value	No value
Elevated blood lead in children	0.0	0.0
Premature mortality	74.0	74.0
Adult high blood pressure	80.4	80.4
Coronary heart disease	73.0	73.0
Chronic obstructive pulmonary disease (COPD)	62.8	62.8
Adult cancer	83.3	83.3
SOCIOECONOMIC FACTORS		
Adults without a high school diploma	69.7	63.3
Housing-burdened low-income households	37.6	37.6
Linguistic isolation	47.2	0.0
Poverty	64.4	54.6
Unemployment	43.1	56.0
Elevated Indicators (above the 50th percentile)	16 of 29 scored	16 of 29 scored no legal status: not a Burdened Area

Highlighted cells are above the 50th percentile. Percentiles compare a block group with every other block group in Massachusetts; they do not say whether any regulatory threshold is exceeded.

Median household income, the indicator the template lists that the state publishes as a share of the state median rather than a percentile.

Block group	Median household income	Share of the state median	Burdened Area income test (65 percent or less)
250277561012	\$85,703	82.4 percent	Not met
250277561013	\$111,525	107.3 percent	Not met

What drives the score

The host block group's score of 80.9 is the statewide percentile of the product of two group scores, pollution and climate burden at 45.0 and population characteristics at 57.0. Inside the first, the environmental effects component at 86.0 ranks 99.7th of the 5,109 Massachusetts block groups, while the pollution exposure component at 23.3 ranks about 15th. Moving the effects component alone to the statewide median would drop the score from 80.9 to about 40. The effects component is where the burden is: cleanup sites at the 90.8th percentile, groundwater threats 88.4, solid waste sites 85.6, impaired water bodies 83.7, hazardous waste generators 81.4. The second driver is chronic disease prevalence in the sensitive populations component: adult cancer at the 83.3rd percentile, high blood pressure 80.4, premature mortality 74.0, coronary heart disease 73.0, COPD 62.8. These health figures come from CDC PLACES model estimates and MassDEP rates, and they are identical for the two block groups because the estimates are made at a coarser geography.

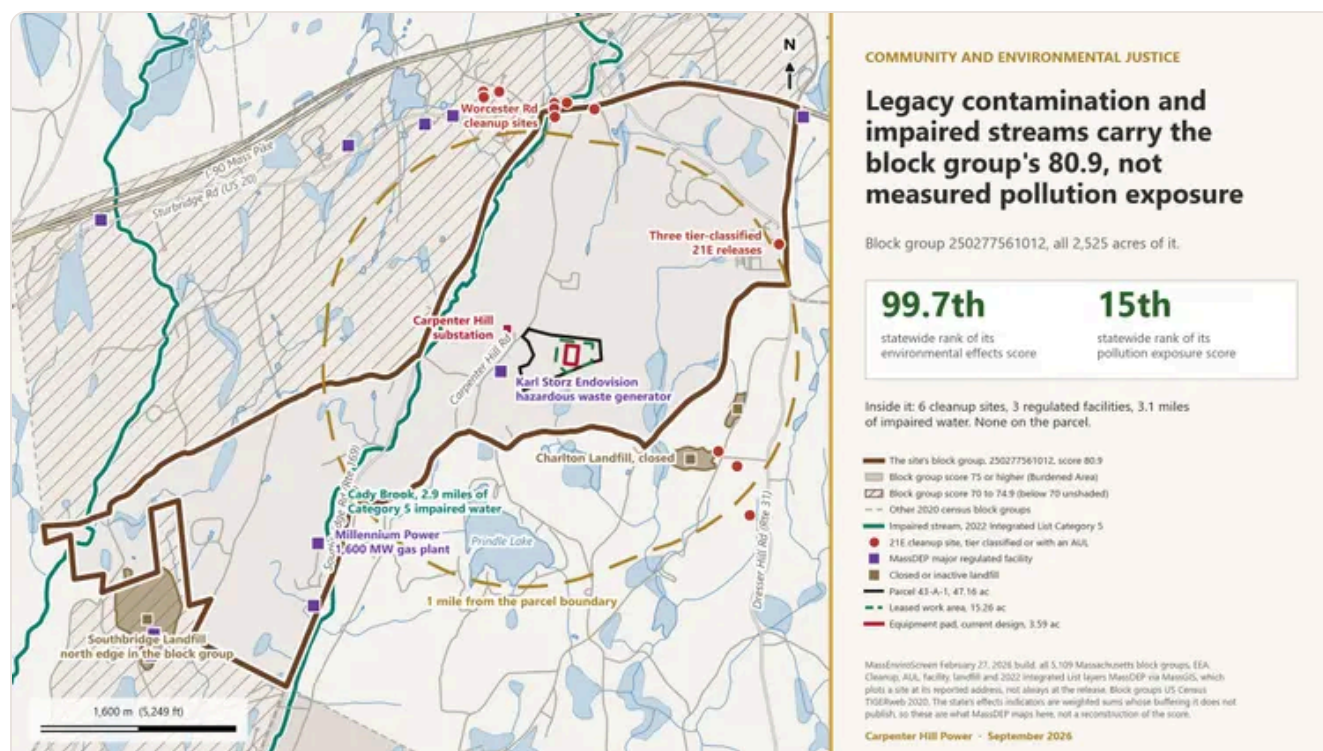


Figure 4. The host block group and the MassDEP features that sit behind its environmental effects score.

MassEnviroScreen February 27, 2026 build, all 5,109 Massachusetts block groups, EEA. Cleanup, AUL, facility, landfill and 2022 Integrated List layers MassDEP via MassGIS, which plots a site at its reported address, not always at the release. Block groups US Census TIGERweb 2020. The state's effects indicators are weighted sums whose buffering it does not publish, so these are what MassDEP maps here, not a reconstruction of the score.

Explanatory comments. The state's technical documentation says a high percentile does not by itself mean a regulatory threshold is exceeded or that a health risk exists; the percentiles compare one block group with the others. Three of the four health indicators and the two air quality indicators nearest the threshold, PM_{2.5} at 54.2 and ozone at 49.9, are regional values shared across central Massachusetts rather than anything local to Carpenter Hill Road. The low birth weight indicator returns no value for either block group, so 29 of the 30 indicators are scored. The neighbouring block group, analysed voluntarily, also carries 16 indicators above the 50th percentile, with a different set: it adds drinking water non-compliance and unemployment and drops solid waste sites and pediatric asthma. Elevated Indicators there have no legal status under 980 CMR 15.02, because the definition applies only where the SGA intersects a Burdened Area, but the project impacts assessed in Sections 5 and 6 reach it in the same ways and the same conclusions apply.

5 Construction phase: project impacts on the Elevated Indicators

For each Elevated Indicator, the question is whether construction of the project would materially exacerbate the condition it measures: worsen it, leave it alone, or improve it. The test in the template's Appendix B looks at standards, perceptibility, measurability, duration, geographic extent, resilience, social and health effects, and the potential for contamination to migrate. Construction runs about 18 months.

The determinations below take account of the measures the project has made a firm commitment to undertake, as 980 CMR 15.07 allows. Those are the commitments on the public Commitment Tracker and the permit requirements the project cannot avoid; the tracker links each to what closes it. Where a determination depends on a study that is not finished, the row says so.

Table 7. Construction phase project impacts related to the Elevated Indicators in block group 250277561012. Percentiles in parentheses.

Elevated Indicator	Project impact during construction	Disproportionate Adverse Effect?	Rationale or reference
Fine particulate matter (PM2.5) (54.2)	Burden, minor and temporary: dust from clearing, grading and gravel placement, and diesel exhaust from equipment and deliveries over about 18 months.	No (preliminary)	The indicator is a regional annual average at the 54th percentile, shared across the region. Construction dust and exhaust are local, intermittent and short-lived; dust control on the pad and the driveway, a stabilized construction entrance and idling limits are standard conditions of the construction stormwater permit and the Board's common conditions. No exceedance of the national PM2.5 standard is expected, and a casual observer beyond the parcel line would not notice a change in ambient PM2.5.
Pollution cleanup sites (90.8)	No impact or insignificant. Construction creates no new cleanup site unless a reportable release occurs.	No (preliminary)	Fuel and lubricants on site during construction are handled under a Spill Prevention, Control and Countermeasure plan and a Licensed Site Professional engaged before construction, both expected as permit conditions. A release above the reportable quantity would be reported and cleaned under Chapter 21E. The indicator counts sites requiring oversight; the project adds none.

Elevated Indicator	Project impact during construction	Disproportionate Adverse Effect?	Rationale or reference
Groundwater threats (88.4)	Burden, potential and controlled: temporary dewatering in poorly drained Ridgebury soil, fuel storage, and concrete work on a site in thin till over bedrock.	No (preliminary), conditional on the geotechnical results	The pad sits 76 percent on poorly drained soil with a seasonal water table within inches of the surface, so dewatering and recharge design follow the September 2026 borings. No injection, no on-site wastewater discharge, no groundwater discharge permit. Erosion controls and the SPCC plan bound the spill pathway. The surface flow-routing screen places two domestic wells downgradient in the pad's own drainage, 0.39 and 0.45 mile away, in bedrock 175 to 665 feet deep; the screen follows land surface and does not say any well is or is not affected. A door-to-door well survey within half a mile, not yet started, locates the 16 records that cannot be placed.
Hazardous waste generators and facilities (81.4)	No impact or insignificant. Construction generates universal waste and small quantities of used oil, handled by licensed haulers.	No (preliminary)	The indicator is a weighted count of registered generators and facilities. A construction site is not a registered facility, and construction waste goes off site under the contractor's registration. No treatment, storage or disposal facility is created.
Solid waste sites and facilities (85.6)	No impact or insignificant. Cleared timber, stumps and construction debris go to permitted facilities off site.	No (preliminary)	The indicator counts solid waste sites and facilities in and around the block group. The project creates none and disposes of nothing on site; stump and debris burial is not proposed.
Impaired water bodies (83.7)	Burden, potential and controlled: sediment from about 10 acres of disturbance could reach the unnamed stream south of the pad.	No (preliminary)	Runoff from the pad drains south to a shrub swamp about 300 feet away and on to McIntyre Pond, a Category 3 water about 1.3 miles away. Cady Brook, the Category 5 stream that carries the block group's impairment listings, is in a different drainage. Silt fence, soil re-establishment and cover cropping run through construction under the construction stormwater permit, a published commitment. The 45.6 acres of clean run-on from above the pad are diverted around the work. No pollutant is added to any listed water body.
Wildfire risk (77.6)	Burden, minor and temporary: hot work, fuelled equipment and cleared slash in a wooded area at the 77.6th percentile for wildfire hazard potential.	No (preliminary)	No batteries are energized until commissioning. Hot work permits, spark arrestors, fire extinguishers on equipment and slash removal are standard construction fire prevention measures under the state fire code and the Charlton Fire Department's authority. Construction does not change the wildfire hazard potential the indicator measures, which is a property of fuels and terrain across the block group.

Elevated Indicator	Project impact during construction	Disproportionate Adverse Effect?	Rationale or reference
Flood risk (54.3)	No impact or insignificant. The whole site is in FEMA Zone X, minimal flood hazard; nothing is built in a flood zone.	No (preliminary)	The indicator is the share of the block group in a one percent annual chance flood zone. The nearest special flood hazard area is about 0.2 mile away. Temporary basins and diversions during construction hold runoff on the parcel; the project adds nothing to any mapped flood zone.
Pediatric asthma (57.0)	Burden, minor and temporary, through the same dust and exhaust pathway as PM2.5.	No (preliminary)	The nearest homes are about 500 feet or more from the equipment area, and no school or daycare is on Carpenter Hill Road near the site. Dust and exhaust controls as above. The indicator is a school-enrollment prevalence at the 57th percentile that construction of this duration and scale would not measurably change.
Premature mortality (74.0)	No impact or insignificant.	No (preliminary)	The pathways from construction to mortality would be air quality or an accident. Air impacts are minor and temporary as above; construction safety is governed by OSHA and the contractor's safety plan. No measurable change to a block-group mortality rate.
Adult high blood pressure (80.4)	No impact or insignificant. Construction noise and traffic are the only plausible pathway, and both are temporary.	No (preliminary)	Daytime construction hours, truck routing and timing set with the town before work begins, and a traffic management plan filed with the town, all published commitments. Noise from construction is regulated under the MassDEP noise policy and the Board's common conditions.
Coronary heart disease (73.0)	No impact or insignificant.	No (preliminary)	As for high blood pressure. No air emissions source is added; construction exhaust is temporary and local.
Chronic obstructive pulmonary disease (COPD) (62.8)	Burden, minor and temporary, through dust and diesel exhaust.	No (preliminary)	As for PM2.5. Controls under the construction stormwater permit and idling limits; no exceedance of an air standard is expected.
Adult cancer (83.3)	No impact or insignificant.	No (preliminary)	No air toxics source is added. The block group's air toxics cancer risk indicator sits at the 21st percentile and is not elevated. Construction does not introduce a carcinogen pathway.
Adults without a high school diploma (69.7)	Benefit, possible: construction employment and trades training over about 18 months.	No	A local hiring preference and a training partnership are proposals in the draft Community Benefits Plan, not yet commitments. The project met the MassHire Central Region Workforce Board on August 14, 2026 and Bay Path Regional Vocational Technical High School on September 8, 2026. Construction employment does not worsen the indicator and may help the people it measures.

Elevated Indicator	Project impact during construction	Disproportionate Adverse Effect?	Rationale or reference
Poverty (64.4)	Benefit, possible: construction wages and local spending during the build.	No	As above. No pathway by which construction increases the share of households at or below twice the poverty level.

Explanatory comments. Two Elevated Indicators would have carried a different answer without firm commitments: impaired water bodies, because sediment from 10 acres of disturbance above a wetland chain is the kind of impact the indicator measures, and groundwater threats, because of the soil the pad sits on. In both cases the commitment that bounds the impact is required by a permit the project cannot avoid, which is the strongest kind of commitment for the purposes of 980 CMR 15.07. The MEPA Office and MassDEP raised the wetland delineation, stormwater and run-on at the September 4, 2026 consultation, and the rows above are consistent with what the project told them.

CIA REPORT TEMPLATE PART IV.B; 980 CMR 15.07; 2024 CLIMATE ACT CLAUSE (II)

6

Operations phase: project impacts on the Elevated Indicators

In operation the facility charges and discharges batteries, burns nothing, has no stack, uses no process water and discharges no wastewater. The impacts that remain are the ones that come from the equipment itself: a credible fire event, the liquids on site, cooling fan and inverter noise, new impervious surface, and cleared forest. This section assesses each against the 16 Elevated Indicators, then asks the Climate Act's separate question about the effects of climate change.

Table 8. Operations phase project impacts related to the Elevated Indicators in block group 250277561012.

Elevated Indicator	Project impact during operations	Disproportionate Adverse Effect?	Rationale or reference
Fine particulate matter (PM2.5) (54.2)	No impact or insignificant. No combustion and no stack; a handful of maintenance vehicle trips a week.	No (preliminary)	The only air emissions in normal operation are from occasional maintenance vehicles. A fire event is assessed under wildfire risk below.
Pollution cleanup sites (90.8)	No impact or insignificant in normal operation. A release from a transformer or a fire event is the pathway.	No (preliminary), conditional on the fire protection engineering report	The main power transformer and the medium-voltage transformers hold the largest liquid inventory on site, in secondary containment sized to 110 percent under the Board's draft common conditions, with an SPCC plan. Firefighting water is captured on site under a published commitment, in the current design by a continuous concrete foundation and a lined drainage swale, so a fire does not become a release to soil. Battery chemistry is lithium iron phosphate, with no nickel, cobalt or manganese. A reportable release would be handled under Chapter 21E; the design's purpose is that none occurs.
Groundwater threats (88.4)	Burden, potential and controlled: liquids stored on site, new impervious surface over a shallow water table, and firefighting water in a fire event.	No (preliminary), conditional on containment design and the fire protection engineering report	Secondary containment, SPCC, firewater capture with testing before disposal, no on-site wastewater, and no groundwater discharge. Post-construction runoff held at today's rate under state stormwater standards with recharge designed to the borings. A groundwater monitoring program with the Board of Health is a published commitment, and neighbour well baseline testing is a proposal in the draft Community Benefits Plan. This report does not state that any well is or is not affected; the flow-routing screen is a screen, and the two downgradient wells draw from fractured bedrock the screen does not model.

Elevated Indicator	Project impact during operations	Disproportionate Adverse Effect?	Rationale or reference
Hazardous waste generators and facilities (81.4)	Burden, minor: the facility may register as a very small quantity generator for used oil, universal waste and any cells replaced over its life.	No (preliminary)	The indicator is a weighted count. The project will report its generator status in the Application. It is not a treatment, storage or disposal facility; spent modules are returned to the manufacturer's recycling stream, not stored on site. [Generator category to be confirmed with the equipment supplier.]
Solid waste sites and facilities (85.6)	No impact or insignificant.	No (preliminary)	No solid waste is disposed of on site during operation or at decommissioning, when equipment is removed and battery materials go to recycling under the plan filed under 980 CMR 1.10.
Impaired water bodies (83.7)	No impact or insignificant, controlled: about 5 acres of new impervious surface draining to a wetland chain in a different drainage from Cady Brook.	No (preliminary)	Stormwater managed to the Massachusetts Stormwater Standards, no net increase in runoff, run-on diverted, a catchment swale along the southern boundary in the current design, and the stormwater design sized to the 2070 100-year storm or the departure documented, as the MEPA Office asked. No pollutant is added to any listed water body.
Wildfire risk (77.6)	Burden, potential: thermal runaway in a battery module is the credible event for lithium-ion storage, on a forested site at the 77.6th percentile for wildfire hazard potential.	Not yet determined. Preliminary: no, conditional on the fire protection engineering report and the hazard mitigation analysis filed with the Application	This is the indicator most closely coupled to the technology and the one on which the determination waits. The units are evaluated under the UL 9540A test method, and the manufacturer states the unit is designed to meet and exceed it; the unit-specific test report comes with the Application. NFPA 855 separation, a 26-foot fire lane around the equipment, 50 feet from equipment to fence, cleared ground between the equipment and the treeline, and an Emergency Action Plan built with the Charlton Fire Department and independently reviewed at the project's expense. MassDEP asked on September 4 whether the fire lane gives apparatus enough access to keep a fire from spreading into the surrounding woods; that question is answered in the fire protection engineering report. A smoke and gas plume dispersion analysis is a published commitment and has not started. The Emergency Action Plan and the plume analysis are posted when done.
Flood risk (54.3)	No impact or insignificant.	No (preliminary)	The site is in Zone X. About 5 acres of new impervious surface is managed under the stormwater standards with no net increase in peak runoff, so the project adds no flood exposure downstream. The extreme precipitation projection, 10.7 inches in 24 hours by 2070, is an input to the design.
Pediatric asthma (57.0)	No impact or insignificant.	No (preliminary)	No operating air emissions. A fire event is assessed under wildfire risk.

Elevated Indicator	Project impact during operations	Disproportionate Adverse Effect?	Rationale or reference
Premature mortality (74.0)	No impact or insignificant.	No (preliminary)	No operating air emissions and no discharge. The fire event pathway is assessed under wildfire risk.
Adult high blood pressure (80.4)	Burden, potential: continuous cooling fan and inverter noise at the nearest property lines and homes.	No (preliminary), conditional on the sound study	Noise is the one operating impact that reaches homes. The MassDEP noise policy limits project sound to 10 decibels above background at the property line and the nearest residence, with no pure tone, and the Board applies it as a condition. The design is required to meet it, and the sound study against the policy, a published commitment, is what shows whether the current layout does. The nearest home is the landowner's, about 500 feet from the equipment area. [An internal screening-level sound model built in September 2026 is under review; whether and when to publish it is a decision for the project team.] Any layout change it produces is logged on the Commitment Tracker with the reason.
Coronary heart disease (73.0)	No impact or insignificant.	No (preliminary), conditional on the sound study	As for high blood pressure. No air emissions.
Chronic obstructive pulmonary disease (COPD) (62.8)	No impact or insignificant.	No (preliminary)	No operating air emissions.
Adult cancer (83.3)	No impact or insignificant.	No (preliminary)	No air toxics source. Magnetic field analysis, not yet started, is filed with the Application under the Board's practice; the site's nearest home is about 500 feet from the equipment.
Adults without a high school diploma (69.7)	No impact or insignificant. A small number of operations and maintenance positions.	No	Operations employment is small. Any operations hiring preference is a proposal in the draft Community Benefits Plan.
Poverty (64.4)	Benefit, possible: property tax or negotiated payments to the Town of Charlton over the operating life.	No	The form and amount of payments to the town are a decision for the town and the project together and are not stated in this draft. The tax analysis is a published commitment and is in progress. No pathway by which operation increases poverty.

The effects of climate change

The Climate Act asks separately whether the project would increase or reduce the effects of climate change on the area. Both directions apply. The facility stores electricity and returns it to the grid when demand is highest, which supports the region's reliability as more of its supply comes from wind and solar and less from fossil generation; that reduction in the effects of climate change is regional, not confined to the block group, and the Board weighs it in the Application. Locally, the project clears up to 10 acres of forest, which is a loss of carbon storage and shade, and adds about 5 acres of gravel and equipment that will run warmer than the woods around it on a hot day. Both local effects are small in extent, and the block group's extreme heat indicator sits at the 18th percentile and is not elevated. The site's own climate exposure, high for extreme precipitation and extreme heat by 2070, is an input to the stormwater design and the equipment thermal specification rather than an impact on the community.

Explanatory comments. Every operating determination above is preliminary because three studies it rests on are not finished: the fire protection engineering report with the hazard mitigation analysis, the sound study against the MassDEP noise policy, and the final stormwater and containment design after the borings. Each is a published commitment with a place on the Commitment Tracker, and each is filed with the Application. If any of them shows that an Elevated Indicator would be materially exacerbated, Section 7 becomes a table of Remedial Actions under 980 CMR 15.08 rather than a list of commitments, and this report is reissued to say so.

CIA REPORT TEMPLATE PART V; 980 CMR 15.08

7 Avoidance, minimization and mitigation

980 CMR 15.08 requires Remedial Actions only where a Disproportionate Adverse Effect is found. None is found in this draft. The measures below are listed anyway, in the mitigation hierarchy the guidance sets out, because they are the reason the answers in Sections 5 and 6 are no, and because the Board can make any of them an enforceable condition.

Table 9. Measures that avoid, minimize or mitigate project impacts on the Elevated Indicators. Every row is a published commitment or a permit requirement the project cannot avoid.

Elevated Indicators addressed	Type	Measure	How it addresses the impact	Basis and documentation
Impaired water bodies; groundwater threats; flood risk	Avoidance	No wetland fill; setbacks from delineated resource areas; the whole site in FEMA Zone X.	Keeps the work out of the resource areas the indicators measure.	Site plan G101 revision 16; ANRAD and Notice of Intent to the Charlton Conservation Commission.
Wildfire risk; adult cancer; COPD; PM2.5	Avoidance	No combustion, no stack, lithium iron phosphate chemistry.	Removes the air pathway in normal operation.	Project description; equipment data sheets in the Document Library.
Groundwater threats; impaired water bodies	Minimization	Total disturbance on the parcel held at or under 10 acres; the 45.6 acres of run-on diverted around any containment; post-construction runoff held at today's rate; a catchment swale along the southern boundary in the current design.	Limits sediment and runoff from the pad to the wetland chain south of it and keeps clean water out of the containment.	Commitment Tracker: clearing cap, drain the site away from neighbors, capture runoff along the southern boundary. MassDEP stormwater standards. Design sized to the 2070 100-year storm or the departure documented, per the MEPA Office.
Groundwater threats; pollution cleanup sites	Minimization	Secondary containment sized to 110 percent for transformer oil, an SPCC plan, a Licensed Site Professional before construction, and firefighting water captured on site with testing before disposal.	Bounds the largest liquid inventories and the fire-event pathway so neither reaches soil or groundwater.	Board's draft common conditions I.A.14 and I.A.15; Commitment Tracker: capture firefighting water on site.

Elevated Indicators addressed	Type	Measure	How it addresses the impact	Basis and documentation
Wildfire risk; premature mortality; pediatric asthma	Minimization	UL 9540A-tested units, NFPA 855 separation, a 26-foot fire lane, 50 feet from equipment to fence, cleared ground to the treeline, and an Emergency Action Plan built with the Charlton Fire Department and independently reviewed at the project's expense. Fire water supply planned with the Fire Chief, built at the project's expense if the department needs it.	Reduces the likelihood of a battery fire, keeps one from spreading, and gives the department the access and water to contain it.	Commitment Tracker: Emergency Action Plan, third-party review, fire water supply. Fire protection engineering report and hazard mitigation analysis with the Application.
Adult high blood pressure; coronary heart disease	Minimization	Sound designed to the MassDEP noise policy at the property line and the nearest residence; equipment about 500 feet from the nearest home.	Keeps operating noise within the state limit where people live.	Commitment Tracker: sound study, residential distance. Board condition.
Groundwater threats	Mitigation	A groundwater monitoring program set with the Board of Health, with terms in writing before construction; a report after the MassDEP groundwater consultation.	Detects a change if one occurs, so it can be acted on.	Commitment Tracker: groundwater monitoring program, MassDEP groundwater report. Neighbour well baseline testing is a proposal in the draft Community Benefits Plan.
Carbon and habitat (not Elevated Indicators; listed for completeness)	Mitigation	Replanting to offset the acres cleared; the PH 865 boundary staked by survey as a no-disturbance line, subject to NHESP's confirmation.	Recovers canopy over time and keeps work out of mapped rare species habitat.	Expected permit condition; MESA review with NHESP.
All	Accountability	Every commitment on a public tracker with what closes it; studies posted as they finish; design changes logged with the reason.	Lets residents and the Board check that the measures happen.	Commitment Tracker; Engagement Log.

COST

The template asks for the expected cost of each measure. This draft states none. Costs are stated in the Application with the engineering that sets them, and no dollar figure appears in the project's public materials until the tax analysis is published.

8 **Project benefits and the Community Benefits Plan**

CIA REPORT TEMPLATE PARTS VI AND VII; 980 CMR 15.02 (BENEFIT); 15.11(2)(H)

The regulation counts a benefit for CIA purposes only if it has a geographic, economic, public health or scientific connection to where the Burdened Area and the SGA overlap. The benefits below meet that test. Anything drawn from the draft Community Benefits Plan is a proposal the Citizen Advisory Committee has not yet shaped, and is labelled that way.

Table 10. Project benefits with a nexus to the Burdened Area. Nature, location, extent and duration.

Benefit	Description	Documentation
Grid reliability and clean energy integration	The facility stores electricity and returns about four hours of supply for about 120,000 homes when demand peaks, through the Carpenter Hill substation inside the block group. Regional in reach, local in location, for the operating life of the facility.	Project description; Application.
Revenue to the Town of Charlton	Property tax or negotiated payments over the operating life, on a parcel that today is assessed as residential land. The form, amount and term are a decision for the town and the project together. No figure is stated until the tax analysis is published.	Commitment Tracker: tax analysis, in progress. Draft Community Benefits Plan.
Construction employment and training	About 18 months of construction work. A local hiring preference and a partnership with regional vocational and workforce programs are proposals in the draft plan.	Meetings with the MassHire Central Region Workforce Board, August 14, 2026, and Bay Path Regional Vocational Technical High School, September 8, 2026. Draft Community Benefits Plan.
Fire department readiness	Equipment, training and a fire water supply for the Charlton Fire Department, sized with the Chief. The Emergency Action Plan and water supply are commitments; funding beyond them is a proposal in the draft plan.	Commitment Tracker; draft Community Benefits Plan.
Well and groundwater protection beyond the permits	Baseline testing of neighbouring wells and a protection fund are proposals in the draft plan. The monitoring program with the Board of Health is a commitment and is listed under mitigation, not here.	Draft Community Benefits Plan.

The Community Benefits Plan

The project has been writing a Community Benefits Plan with a Citizen Advisory Committee since June 3, 2026, following the Office of Environmental Justice and Equity's Standards and Guidelines for Community Benefit Plans and Agreements. The working draft, version 0.1, goes to the committee on September 10, 2026, to the public at the September 30 meeting, and into public comment from October through November 30, 2026. It groups what residents have raised into the state's four categories, writes each proposed commitment as an outcome with a measure, a duration, a decision-maker, a funding source and a remedy, and lists the mitigation the permits already require separately so that none of it is counted as a benefit. The priorities most connected to the Elevated Indicators are fire readiness, well protection and the town's finances. Whether any of the plan becomes a signed Community Benefits Agreement is a decision for the Town of Charlton and the project together; the statute requires the project to pursue a plan, and the Board gives a plan or an agreement due weight under 980 CMR 15.11(3). The plan is linked at the end of this report.

CIA REPORT TEMPLATE PART VIII; 980 CMR 15.11

9 Conclusion, and what would change it

On the record so far, the project is not expected to materially exacerbate any of the 16 Elevated Indicators in block group 250277561012 in construction or in operation, so no Disproportionate Adverse Effect is identified and no Remedial Action is required under 980 CMR 15.08. That conclusion is preliminary, and this section says exactly what it rests on.

What the conclusion depends on.

Open study	Elevated Indicators it bears on	When	What changes if it goes the other way
Fire protection engineering report and hazard mitigation analysis, with the unit-specific UL 9540A test report	Wildfire risk; pollution cleanup sites; groundwater threats	With the Application	The wildfire risk row becomes a finding, and the fire and containment measures become Remedial Actions under 980 CMR 15.08 with costs stated.
Sound study against the MassDEP noise policy	Adult high blood pressure; coronary heart disease	In progress; results published	A layout change, a barrier or an equipment specification, logged on the tracker, before the Application.
Geotechnical borings, then the final stormwater and containment design	Groundwater threats; impaired water bodies; flood risk	Borings September 2026; design with the Application	Foundation, dewatering, recharge and liner design follow the results. A pad relocation is logged with the reason.
Field wetland delineation, MESA review, alternatives analysis	Impaired water bodies; habitat (not an Elevated Indicator)	This fall; with the Application	The buffer overlap and the habitat line are confirmed by survey rather than by mapping.
Door-to-door well survey within half a mile	Groundwater threats	Not yet started	The 16 unplaced well records are located and the screen is re-run.

Under 980 CMR 15.11 the Board assesses the adequacy of this analysis, makes its own finding on whether the project has given due consideration to cumulative impact and has adequately avoided, minimized or mitigated any Disproportionate Adverse Effect, considers the Community Benefits Plan, and may add enforceable conditions. The project's part is to bring the Board a record it can rely on. This working draft is the first version of that record; it is updated when the studies above finish, shared again with Key Stakeholders, and filed in final form with the Application in early 2027.

980 CMR 15.07(4) AND 15.04(6); OEJE GUIDANCE PART VI

10 Community input, and how to take part

The rule requires the project to gather community input during pre-filing and address it in this report. The guidance says lived experience is data. This section records what residents and officials have raised that bears on the analysis, where the record of it lives, and the two ways a reader can change what this report says.

What the community has raised that bears on the Elevated Indicators, and where it is answered.

Raised	Where and when	Indicators it bears on	Where it is answered
Private well contamination and groundwater	Planning Board, June 3, 2026; public meeting, July 8; Citizen Advisory Committee, August 4	Groundwater threats; pollution cleanup sites	Sections 5 and 6; the well screen and inventory; the groundwater monitoring commitment; the well protection proposals in the draft plan.
Runoff to neighbours and waterways, after problems at earlier solar projects in town	Public meeting, July 8	Impaired water bodies; flood risk	Sections 5 and 6; erosion controls and the southern swale on the tracker.
Fire, thermal runaway and the department's readiness	Select Board, April 14; every meeting since; Fire Safety Webinar, August 19	Wildfire risk; premature mortality; pediatric asthma	Section 6; the Emergency Action Plan and the fire water commitments; the fire readiness proposals in the draft plan.
Cumulative burden: the town already hosts a gas plant, a landfill and cleanup sites	Select Board, April 14; Citizen Advisory Committee, June 3	The score itself	Section 4, which shows what sits behind the 80.9 and that none of it is on the parcel; Section 8.
Noise at the nearest homes	Public meeting, July 8	Adult high blood pressure; coronary heart disease	Section 6; the sound study commitment.
Property values and the town's finances	Planning Board, June 3; public meeting, July 8	Poverty; adults without a high school diploma	Section 8; the tax analysis and the neighbour protection proposals in the draft plan.

Two ways to change this report

- Tell us what it is missing. The state's guidance says extraordinary local conditions, a source not in the data, or an error in the underlying data are all reasons to look again. Send it to the contact below, raise it at a meeting, or use the comment form on this site. We check it, answer on the Engagement Log, and revise this report if it changes an answer.
- Petition for a full analysis of a neighbouring block group. Under 980 CMR 15.04(6), ten or more residents or businesses of a block group that intersects the SGA but is not a Burdened Area, at least one of them a Key Stakeholder, may ask the project during pre-filing to analyse that block group as if it were one, with a copy to the Director of the Department of Public Participation and the Director of the Siting Board. If the project declines, the group may petition the Director within 14 days after the Application is filed, stating the extraordinary circumstances. Block group 250277561013 is the one this applies to, and this draft already analyses it voluntarily.

Translation, interpretation or another accommodation for any meeting about this analysis is available on request. The Language Demographic Analysis of September 4, 2026 found no language spoken by five percent or more of the population within a mile who also speak English less than very well, and the project provides Spanish and Portuguese on this site voluntarily.

CIA REPORT TEMPLATE APPENDIX A AND B

11 Sources, methods and terms

The indicator definitions and sources are the state's, from Appendix A of the CIA Report Template and the MassEnviroScreen technical documentation. The method for deciding whether an impact is material is the template's Appendix B, applied row by row in Sections 5 and 6.

How materiality was judged

For each Elevated Indicator and each phase, the analysis asked the template's Appendix B questions in order: whether construction or operation would likely exceed a public health, environmental or climate standard; whether a casual observer would notice the impact; whether it can be measured; how long and how often it occurs; whether it would extend the burden beyond its present geographic extent; how it affects the ability of the indicator to absorb and recover from disturbance; whether it affects social, economic or cultural conditions or public health; and whether contamination could migrate on or off site by air, ground or water. An impact was called material only if the answers pointed to a lasting, measurable worsening of the condition the indicator measures. Where the answer depends on a study that is not finished, the row says so and the conclusion is conditional.

The indicators and their sources, from Appendix A of the CIA Report Template.

Indicator	What it measures	Source
PM2.5	Annual average fine particulate concentration	U.S. EPA
Ozone	Maximum 8-hour average modelled ground-level ozone	U.S. EPA
Nitrogen dioxide	Annual average NO2 at 1 km, aggregated to block groups	NASA
Diesel particulate matter	Diesel PM concentration in air	EJScreen 2024
Drinking water non-compliance	Safe Drinking Water Act compliance score of the community water system serving the block group	EJScreen 2024
Air toxics cancer risk; respiratory hazard index	Lifetime inhalation cancer risk; non-cancer respiratory hazard ratio	U.S. EPA
Proximity to heavy traffic	Heavy traffic proximity index	EJScreen 2024
Pollution cleanup sites	Weighted count of cleanup sites under federal or state oversight	U.S. EPA; MassGIS
Groundwater threats	Weighted count of groundwater threats	U.S. EPA; MassGIS

Indicator	What it measures	Source
Hazardous waste generators and facilities; solid waste sites	Weighted counts	MassGIS
Impaired water bodies	Count of pollutants across impaired waters in the area	MassGIS
Drought	Weekly share of area in severe to exceptional drought, 2019 to 2024	U.S. Drought Monitor
Wildfire risk	Mean wildfire hazard potential	USDA; U.S. Forest Service
Flood risk	Share of area with at least a one percent annual chance of flooding	FEMA; MassGIS
Extreme heat days	Days at or above 85 degrees, May to September, 2015 to 2024	Oregon State University
Premature mortality; elevated blood lead; pediatric asthma	Age-adjusted rate; five-year childhood prevalence; school-enrollment prevalence	MassDEP
Adult cancer, COPD, coronary heart disease, high blood pressure	Modelled adult prevalence	CDC PLACES
Low birth weight infants	Share of live births under 2,500 grams	State data; no value published for these block groups
Education, poverty, linguistic isolation, unemployment, median income	American Community Survey five-year estimates, 2019 to 2023	U.S. Census Bureau
Housing-burdened low-income households	Share of households both low income and paying over half of income for housing	U.S. HUD

MassEnviroScreen, February 27, 2026 build

Executive Office of Energy and Environmental Affairs, Office of Environmental Justice and Equity. Block group scores and all 30 indicator percentiles read from the state's feature service (MassEnviroScreen20260227_gdb) on September 8, 2026 for block groups 250277561012 and 250277561013; component ranks computed against all 5,109 Massachusetts block groups.

980 CMR 15.00

Cumulative Impact Analysis and Standards for Applying Site Suitability Criteria, Energy Facilities Siting Board, effective May 8, 2026.

CIA Report Template and Instructions

Energy Facilities Siting Board, current version retrieved August 26, 2026 from the EFSB Permitting Dashboard. Tables 1 to 10 and Appendices A and B in this report follow it.

Standards and Guidelines for Cumulative Impact Analysis	Office of Environmental Justice and Equity, April 2026. In the Document Library.
Site plan G101 revision 16	June 10, 2026. Facility Boundary components measured from the matching CAD export.
MassGIS and federal layers	Pulled September 2 to 4, 2026, including the MassDEP Chapter 21E, AUL, major facility, landfill and 2022 Integrated List layers over the block group's extent; census block groups from TIGERweb 2020; FEMA National Flood Hazard Layer; NHESP and BioMap habitat; wellhead protection areas.
Terrain, soils, drainage and wells	September 3, 2026 analysis on MassGIS 2013 to 2021 bare-earth LiDAR, NRCS SSURGO soils and the MassDEP Well Driller Program database. Desktop findings on published mapping; survey and borings govern.
Interagency consultation	Convened by the Department of Public Participation on September 4, 2026, with staff of DPU, EEA, the MEPA Office, MassDEP and MassWildlife. The project's notes are the source for the agency requests cited here.
Community input	The Engagement Log on this site: Select Board April 14, 2026; Citizen Advisory Committee June 3 and August 4; Planning Board June 3; public meeting July 8; Fire Safety Webinar August 19; kitchen table talks and Old Home Day September 5 and 6.
Draft Community Benefits Plan	Version 0.1, September 2026, on this site.

Terms used in this report

Cumulative Impact Analysis (CIA)

The process by which an applicant identifies, considers and addresses the combined effect of past and present activities plus the proposed project on the environment, public health and climate resilience in a Burdened Area (980 CMR 15.02).

Specific Geographical Area (SGA)

The area within a fixed distance of the Facility Boundary, set by facility type in 980 CMR 15.05(1). One mile for a clean energy storage facility.

Facility Boundary

The outermost boundary of the project site, such as the outermost area of construction or disturbance or the fence line, and for a linear component the edge of the right of way (980 CMR 15.02).

Burdened Area

A census block group with a MassEnviroScreen score of 75 or more, or a median household income of 65 percent or less of the state median (980 CMR 15.04(1)).

MassEnviroScreen

The state's screening tool, maintained by the Office of Environmental Justice and Equity, that scores every census block group on 30 indicators and produces a cumulative burden percentile.

Indicator

One statistical measure of environmental exposure, environmental effect, climate risk, sensitive population or socioeconomic condition in a block group, expressed as a statewide percentile.

Elevated Indicator

For a clean energy facility, an indicator above the 50th percentile statewide, identified only where the SGA intersects a Burdened Area (980 CMR 15.02).

Project Impact

An effect, positive or negative, on the environment, socioeconomic or public health conditions, or climate resilience, from construction or operation of the project.

Disproportionate Adverse Effect

A Project Impact likely to materially exacerbate an Elevated Indicator in a Burdened Area intersecting the SGA, after positive and negative impacts are weighed, with a net negative result (980 CMR 15.02).

Remedial Action

An action that avoids, minimizes or mitigates a Disproportionate Adverse Effect (980 CMR 15.08).

Benefit

A positive effect on public health, the environment or climate resilience with a geographic, economic, public health or scientific nexus to the overlap of the Burdened Area and the SGA (980 CMR 15.02).

Key Stakeholder

Abutters, community organizations, municipal and regional officials, labor and apprenticeship representatives, and Tribes, as 980 CMR 16.02 lists them.

Category 5 water

A water body on the state's Integrated List that is impaired and needs a pollutant budget (a TMDL).

UL 9540A

The test method for evaluating thermal runaway fire propagation in battery energy storage systems.

NFPA 855

The National Fire Protection Association standard for the installation of stationary energy storage systems, applied through the state fire code.

SPCC plan

A Spill Prevention, Control and Countermeasure plan under federal oil pollution rules, for a site that stores oil above the threshold.

Questions about this report

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Translation, interpretation, or another accommodation for any meeting about this report is available on request.

The live version of this report, the slides, every map in it at full size, the Commitment Tracker, the Engagement Log, and every document it rests on are at carpenterhillpower.com/reports/cumulative-impact. When a version of this report is replaced, the old one stays readable, with the date it changed and the reason.

RELATED

Site Suitability Analysis: carpenterhillpower.com/reports/site-suitability

Draft Community Benefits Plan: carpenterhillpower.com/benefits/plan

Engagement Log: what people asked and what we said: carpenterhillpower.com/engagement-log

Commitment Tracker: carpenterhillpower.com/commitments

State Standards and Guidelines for Cumulative Impact Analysis (April 2026): carpenterhillpower.com/documents

How We Follow the Siting Rules: carpenterhillpower.com/siting-rules

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