



TOWN OF WORTHINGTON

Planning Board

Thursday, March 12, 2026

Attorney General Andrea Joy Campbell
Office of the Attorney General
One Ashburton Place
Boston, MA 02108

Dear Attorney General Campbell:

Please find the enclosed supplemental materials relating to the recent bylaw amendments passed by Worthington at a Special Town Meeting on February 24, 2026, bylaw submission case #12194.

These materials are specific to Article 7, which seeks to add a moratorium on solar in certain sensitive areas as Section 8.5.7, and Article 8 which seeks to add a moratorium on large capacity energy storage systems as Section 8.8.

Our supplemental materials include a discussion of the purposes for which we seek these moratoria, as well as citations to support the moratoria as written. They also include three maps illustrating the impact of the moratoria on the ability to site solar or energy systems in town. These maps are meant to be illustrative, not official zoning maps. They are based on state GIS data, but were not professionally produced. In particular, the analysis of the 300' setback for large capacity energy storage includes every structure in Worthington rather than following the language of the bylaw to include only "residences and structures where the public congregates." This was deemed reasonable for illustrative purposes as the majority of structures in Worthington are either residences or structures where the public congregates, but technically the map includes structures such as garages and barns which would not typically require a setback.

Supplemental: PURPOSE & CITATIONS

Purpose I: Critical Water Resource Protection

Whereas the Town of Worthington has water resources of critical importance whose protection is incompatible with hazardous materials potentially released due to fire, vandalism or extreme weather events from the Battery Energy Storage Systems (BESS)

currently accessory to Large-Scale Ground Mounted Solar Photovoltaic Installations, the Town requires a moratorium to strengthen protections of the Westfield River Watershed and the Worthington Water Supply District.

Forty percent of Worthington's land area is within the Westfield River watershed and is designated as a surface water source for the river and as public drinking water. This watershed consists of 516.5 square miles and contains Massachusetts' longest undammed section of river in the state, and is home to several endangered species. The Westfield River Watershed is widely recognized as one of the highest priorities for biodiversity conservation in Southern New England protected by several state regulations, including, but not limited to: Wetlands Protection Act (310 CMR 10.00), Rivers Protection Act (310 CMR 10.58), Forest Cutting Practices (304 CMR 11.00), Massachusetts Endangered Species Act (321 CMR 10.14).

The Worthington Water District provides 168 service connections to approximately 565 residents and 50 hydrants, and maintains and operates eleven (11) sources of water. The sources are seven bedrock wells (01G-04G and 09G-11G) and four-spring sources (05G-08G); all are located in relatively close proximity to each other in the north central section of town. Worthington Fire District's water sources consisting of wells and springs are located in an aquifer with a high vulnerability to contamination because they are drawn from fractured bedrock groundwaters. Unlike gravel and sand aquifers which can act as filters to contaminants, fractured bedrock has no significant hydrogeologic barrier to prevent contaminant migration. The 2005 [Worthington Source Water Protection Plan](https://worthington-ma.us/wp-content/uploads/2018/06/SourceWater.pdf) (SWPP) (<https://worthington-ma.us/wp-content/uploads/2018/06/SourceWater.pdf>) identifies water system vulnerabilities to contamination and describes techniques to manage potentially contaminating land uses.

Purpose 2: Creating a Large Scale Ground Mounted Solar Photovoltaic Overlay District to provide Site-Selection Criteria for Commercial Solar Arrays

Our solar by-law was passed in 2017. Section 8.5.3 *General Requirements* states:

- A. *The following requirements are common to all LSGMSPI to be sited in Designated Locations.*

Those Designated Locations were not appropriately defined in the bylaw and we require time to amend the bylaw to provide site selection guidance to applicants consistent with the newly defined Large-Scale Ground-Mounted Solar Photovoltaic Facilities Overlay District. Under consideration is prohibiting or strongly restricting commercial solar arrays on land of high environmental significance, while allowing development of solar projects on land of lesser environmental sensitivity. Land of environmental significance may include

the watershed and water resource areas outlined above, as well as forested carbon sequestration land, and high biodiversity parcels.

The need for minimization and mitigation measures based on site suitability is within the rights of a local municipality and consistent with current and proposed state law.

Purpose 3: Creating a Large Capacity ESS Overlay District to provide Site-Selection Criteria for commercial Energy Storage Systems

Our existing By-Law does not address the unique siting needs of commercial Energy Storage Systems (ESS). Rapidly evolving technology and new information on fire safety and thermal runaway associated with these systems urgently requires that new By-Laws be adopted to protect public safety and public water sources. The existing By-Law allows LSGMSPIs anywhere in town, but does not speak to the specific needs of the ESS often a component of these projects, as well as the possibility of a stand-alone ESS system.

Despite important regulatory and technology improvements to make ESS safer, there continue to be dozens of incidents in the last two years and the risk cannot be summarily dismissed when systems are sited close to residential buildings or buildings where the public congregates such as schools, or on vulnerable areas of environmental concern such as public water sources.

Environmental Protection Agency (EPA) best practices guidance states energy storage systems “Comply with state and local siting, zoning, marking, and permitting requirements to ensure site suitability.” Worthington has an all-volunteer Planning Board. There is a sudden and overwhelming number of these projects being planned in rural towns and Worthington faces an urgent need to create local siting and setback criteria to protect the health and safety of residents and vulnerable natural resources.

Purpose 4: Understanding and developing bylaws compatible with DOER’s proposed regulatory changes.

DOER has proposed changes to both the site selection process and the local permitting processes relating to LSGMSPI and ESS. Those changes are expected to go into effect in 2026. The Worthington Planning Board wishes to modify the Town’s bylaws to be compatible with the regulatory changes, but in the meantime, while we work to understand the implications of the changes, we wish to protect the sensitive water and environmental areas in the Town.

Temporary Moratorium

During the moratorium period, the Town shall undertake a planning process to study, review, analyze and address what revisions to the Zoning By-laws relative to Large Scale Ground Mounted Solar Photovoltaic Installations and Battery Energy Storage Systems are necessary to address the stated purpose of designated site selection criteria to protect the public drinking water and public safety.

Supplemental: MAPS

1. The map labeled “Area protected from Large Scale Ground Mounted Solar Installations under proposed temporary moratorium” illustrates the impact of Article 7.
2. The map labeled “Area protected from Large Capacity Energy Storage System Installations under proposed temporary moratorium” illustrates the impact of Article 8 based on landscape characteristics, it does not include the 300’ setback.
3. The map labeled “Area protected from Large Capacity Energy Storage System Installations under proposed temporary moratorium (including 300’ setback)” expands on the previous to illustrate the impact of Article 8 based on both landscape characteristics and the 300’ setback.

All maps are available to the public on the Worthington Planning Board website, and have been since the hearing was posted.

We hope that this information is useful as you review the moratoria approved by Worthington’s Special Town Meeting and look forward to your decision.

Respectfully,

The Worthington Planning Board:

Kate Bavelock

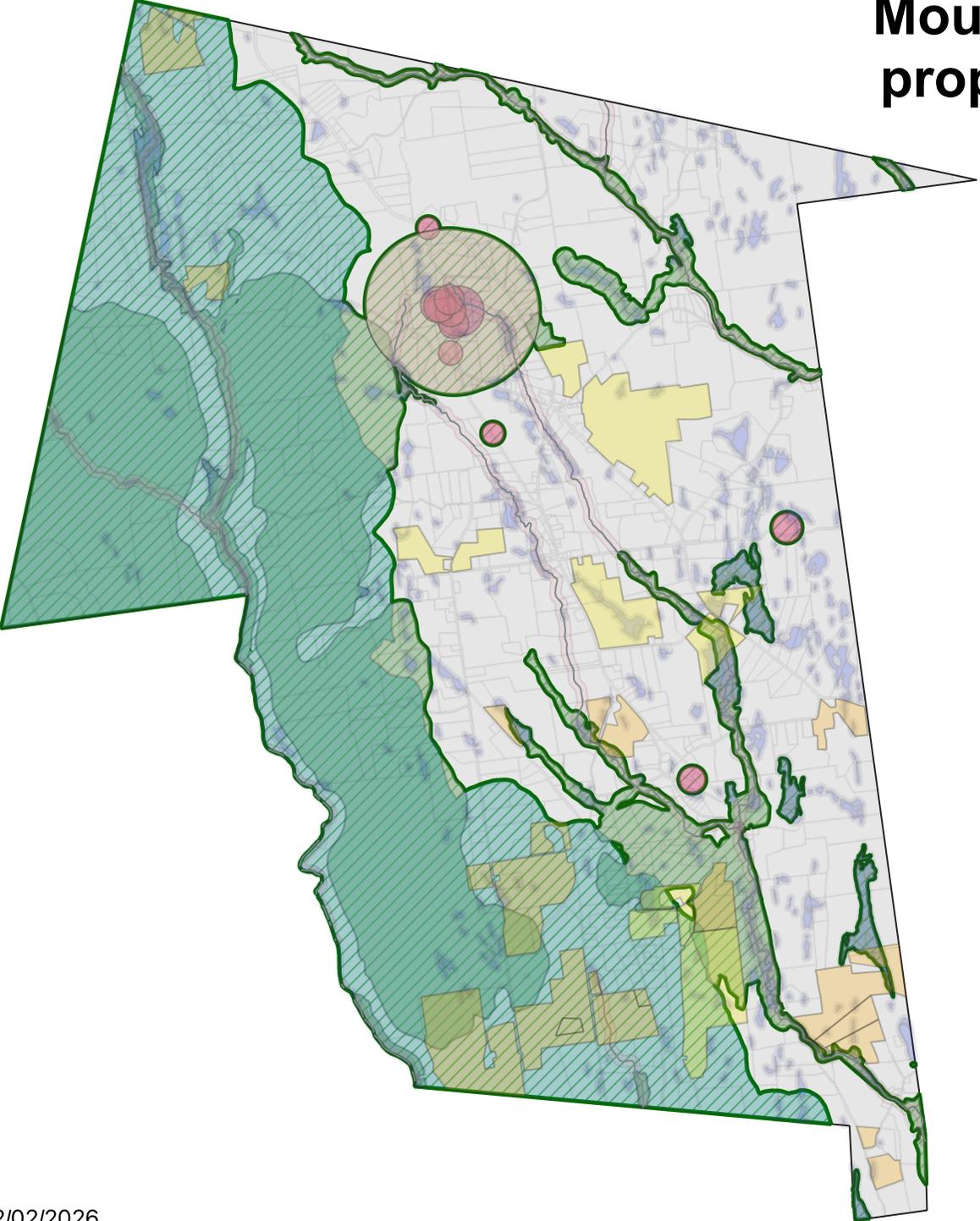
Kathy Ford

Nestor Matthews

Anna Maunz

Bart Niswonger, chair

Area protected from Large Scale Ground Mounted Solar Installations under proposed temporary moratorium.



Wellhead Protection

- Water Supply Protection District (approximate)
- Interim Wellhead Protection Areas (All Public Water Supplies)

Outstanding Resource Water

BioMap3

Core Habitat

Protected / Unprotected

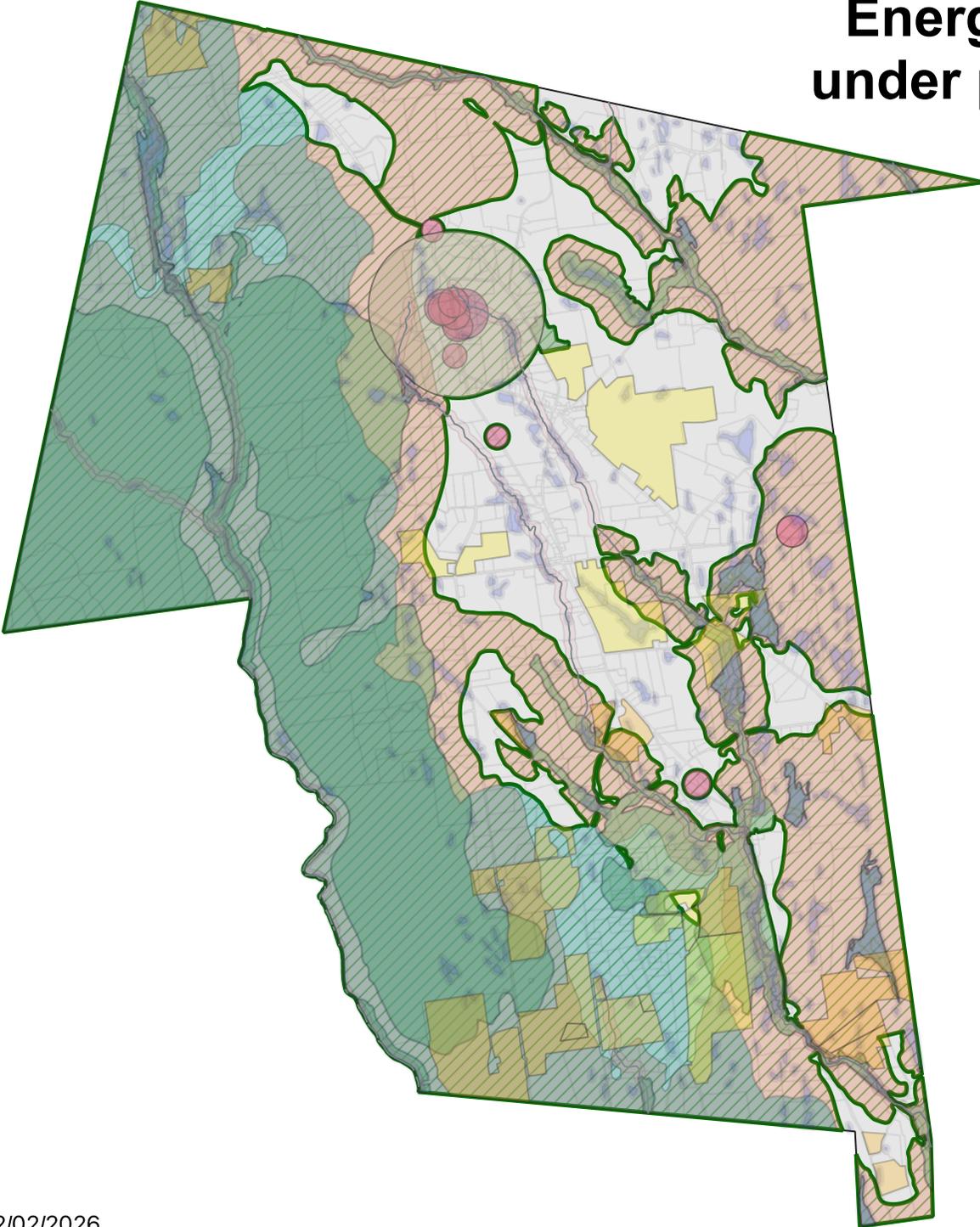
- Features Protected by proposed moratorium
10,878 acres (52.9%)
- Unprotected
9,668 acres (47.1%)

Total acres in Worthington: 20,546

Protected in Other Ways

- Land Use Restrictions
 - Agricultural Preservation Restriction
 - Conservation Restriction
- Wetlands
 - Waterways - Buffered 200'
 - Wetlands - Buffered 100'

Area protected from Large Capacity Energy Storage System Installations under proposed temporary moratorium



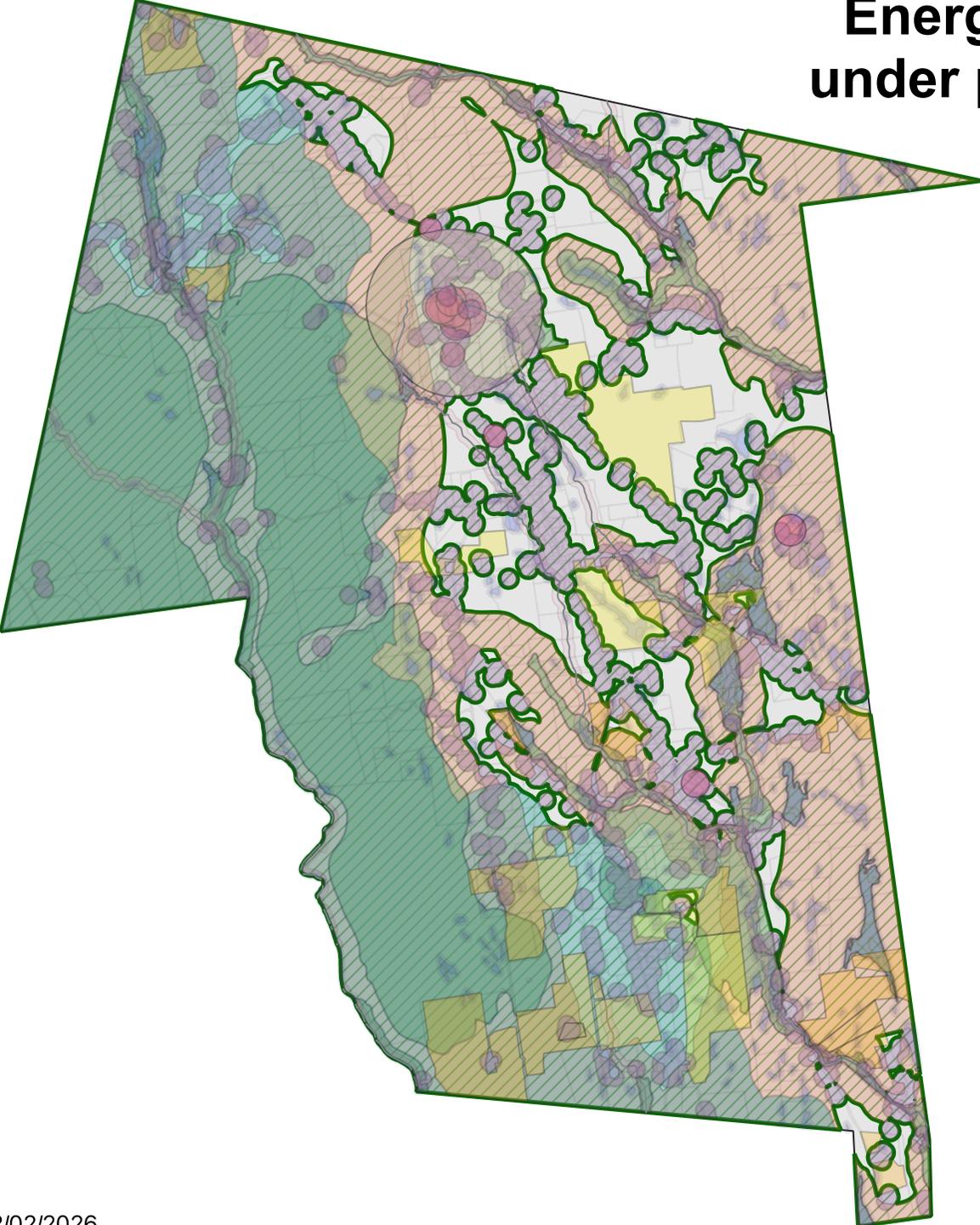
- Wellhead Protection**
 - Water Supply Protection District (approximate)
 - Interim Wellhead Protection Areas (All Public Water Supplies)
 - Outstanding Resource Water

- BioMap3**
 - Core Habitat
 - Critical Natural Landscape

- Protected / Unprotected**
 - Features Protected by Proposed Moratorium
16,036 acres (78.0%)
 - Unprotected
4,510 acres (22.0%)
- Total acres in Worthington: 20,546

- Protected in Other Ways**
- Land Use Restrictions**
 - Agricultural Preservation Restriction
 - Conservation Restriction
- Wetlands**
 - Waterways - Buffered 200'
 - Wetlands - Buffered 100'

Area protected from Large Capacity Energy Storage System Installations under proposed temporary moratorium (including 300' setback)



Wellhead Protection

- Water Supply Protection District (approximate)
- Interim Wellhead Protection Areas (All Public Water Supplies)

- Outstanding Resource Water
- 300' Setback from all structures

BioMap3

- Core Habitat
- Critical Natural Landscape

Protected / Unprotected

- Unprotected
2,667 acres (13%)
- Features Protected by Proposed Moratorium
17,879 acres (87%)

Total acres in Worthington: 20,546

Protected in Other Ways

Land Use Restrictions

- Agricultural Preservation Restriction
- Conservation Restriction

Wetlands

- Waterways - Buffered 200'
- Wetlands - Buffered 100'