

From: [Susan Shocket](#)
To: [SitingBoard Filing \(DPU\)](#)
Subject: Stakeholder Comments on Site Suitability Criteria for Clean Energy Infrastructure
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Attachments: [2023.06.27 Letter to Gov't Entities FINAL.pdf](#)

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Thank you for the opportunity to submit feedback to assist the Commonwealth – and its cities and towns – in future regulation of solar siting. My organization's experience with Norfolk County and Kearsarge Energy regarding the qualification, bidding, design and permitting of large scale solar arrays illustrates the need not only for stricter protection and conservation of valuable farmland and open space (which are threatened by financial incentives to construct solar thereon), but also the need for tighter regulation, fact checking and auditing of state Department of Energy Resources' (DOER) SMART program application process.

For the past eight years, a large group consisting of environmental organizations (including MassAudubon and the Walpole Preservation Alliance (WPA)), residents of Walpole, the Town of Walpole and stakeholders at the Norfolk County Agricultural High School (teachers, students and parents) has fought for appropriate planning, accountability and proper oversight with respect to Kearsarge Energy's proposed construction of a large-scale ground-mounted solar photovoltaic arrays on a portion of the Norfolk County Agricultural High School campus owned by the Norfolk County Commission.

The proposed solar array would be built on 17 acres of prime soil hayfields on designated scenic road, North Street, in Walpole that have been farmed continuously for over 300 years. Norfolk County and Kearsarge Energy have responded to public outcry regarding the loss of farmland and open space by increasing the scale of the project considerably, thus exacerbating those losses.

Nearly two years ago, the WPA filed a detailed complaint with the state DOER which shows that Kearsarge never satisfied the fundamental state rules and regulations for SMART credits that make the project so profitable (and therefore enticing to the company), and illustrates a pattern of questionable dealings between the County Commissioners and Kearsarge throughout the process. WPA's complaint included a raft of supporting documents that show email exchanges detailing how Kearsarge knowingly skirted the rules to deceive the state. I've attached the complaint, which has triggered an ongoing, formal investigation by DOER.

The massive amount of opposition to the Norfolk County solar project, combined with the evidence of unscrupulous dealings by the County and Kearsarge, should have squelched this project years

ago. Instead, Kearsarge and the County have pressed on, with residents still paying (with private funds) to ensure proper review and oversight of the project, all while DOER's investigation continues in the background.

We ask that you please protect farmland and green space from large-scale solar arrays going forward, and allow residents a voice in enforcing reasonable local zoning and environmental regulations within their towns. We also ask that you enforce safeguards in the SMART application process to ensure that applicants aren't skirting the rules to mislead the state, and that adequate remedies (including timely review of and determination on alleged shortcomings) are in place to offer meaningful protections where those safeguards are violated.

Thank you,

Sue Shocket- President Walpole Preservation Alliance