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Department of Energy Resources

Boston, Ma.

Attn. Kaitlin Kelly

I am writing to ask that the DOER use it's position and authority to **create a win/win situation** between large scale developers and small towns concerning the goal of increasing solar production.

As it now stands, our economically struggling small towns do not have the monetary resources to stop Large Scale Commercial Solar Development when the project is poorly sited, poorly designed and/or unsafe. These **out of state companies and investors can outspend our small towns in the courts**, even when towns deny the permits based on designs failing to meet by-law standards and requirements. Such is the case with Blue Wave in Belchertown, Ma. Most small towns don't even have solar bylaws and have been overwhelmed with the rush of companies coming in to make their claims.

DOER gives incentives to build these projects to out of state companies that do not have the expertise to build on sensitive sites, some of which

are not appropriate due to health and safety issues. And yet, **the state does not provide the protection towns need.**

For example, **concerning the DOER's proposal to combine Eversource East and West energy capacity blocks into a single service territory:** this will allow all of the solar development capacity for Eversource East in eastern Mass to be sited in western and central Mass, **placing undo solar development pressure on communities in the western and central part of the state.**

Another example is the proposal to allow solar construction on protected lands when a project could cover up to 50% of the parcel!!! There is no protection for the land or towns in such a proposal. **I strongly urge you to eliminate the "50% of parcel" caveat that opens up protected land to solar ray installations.**

There should also be **a required Buffer Zone** around protected Priority Habitat, Core Habitation and Critical Natural landscape lands.

If the real goal is to become "green", we need to protect our natural resources: forests, water, habitat, etc. Mass Audoban addressed the need to protect not only the mature forests, but also the forests that have the potential to mature. Our loss of mature forests is a major factor in our loss of species that are an integral part of maintaining ecological balance. They also play a critical role in mitigating climate change. **UMass research shows that New England is positioned to heat up faster than the rest of the country due to the melting of the glaciers and change in wind and weather patterns.**

Another concern towns have is the increased rainfall, change of temperatures that create more rain and thaw and freeze phenomena

particularly in wooded, sloped areas. None of the "guidelines" address these health and safety concerns. Our towns are trying to prepare for the future and sustainability. Your guidelines show that you have not looked at how to allow large scale solar in appropriate, safe ways. You are not considering how to create a green state with all of the factors that are essential for ecological balance and sustainability. Please refer to the Harvard Study on Forests and Sustainability, Petersham, Ma. They have taken into account the loss of forested land(40acres/week), the need to have productive forests, climate change and the essential role forests play.

They have designed a proposal to reach a critical balance between these factors. **We don't have time to waste! We need your help in securing our natural resources as well as safe solar!!**

Please refer to the letter submitted by Mark Spiro. He has included maps that show the land topology in Western Mass, which is unique due to the Glacial formation of much of the valley. There are numerous places where the slopes are greater than 10%, slopes that are mostly bedrock where the forests are essential, holding an intricate and fragile ecosystem in place. Most of these areas are rich with underground springs that provide water for surrounding towns.

These lands cannot be safely mitigated to provide a space to build Commercial Solar. Most of these are in residential areas near conserved land for wildlife habitat and corridors for animal migration. **Towns are working feverishly to conserve the very land you are giving incentives to out of state companies to develop!** We cannot replace the maturing forests in any timely way when they are being clearcut, stumped etc. These sensitive sites are intricate and fragile in their

ecology.

We need your guidelines to have teeth as requirements when it comes to sloped and forested land that are essential to our goals of creating a real and sustainable 'green' future for our towns, the state and New England.

Please read Mark Spiro's paper for details and specific suggestions, along with hydrologist Steve Garabedian's letter for technical details.

We need DOER to look at all of the variables when it comes to resources and "being green". Otherwise, we are creating more problems by having a narrow perspective.

Thank you for your time and consideration.

Lee Paddy