

Ms. Kaitlin Kelly  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

May 25, 2016

Dear Ms. Kelly,

My name is Andrea Cummings and I am writing to you about my concern regarding the SREC emergency regulation meeting that is coming up. I am a strong advocate of solar and renewable energy however recently we have been faced with the proposal of a large scale, ground mounted, 6 megawatt solar array that is planning to be placed on 30 acres of conservation forest land in Shutesbury Massachusetts. Shutesbury is a small rural community with New England charm including stone walls, dirt roads, and forest land. Much of the town is owned by Cows Lumber who are currently looking to diversify their business model away from timber and into new areas. They are proposing to rent their land to solar developers. This means that the developers are looking to stomp, clear, and grade 30 acres of beautiful forest land to develop a 6 megawatt solar array.

My understanding is that the December 2014 DOER Model solar bylaw states that "DOER strongly discourages locations that result in significant loss of land and natural resources, including farm and forest land, and encourages rooftop siting, as well as locations in industrial and commercial districts, or on vacant, disturbed land. Significant tree cutting is problematic because of the important water management, cooling, and climate benefits trees provide." I hope that the DOER will hold true to these important standards. The reason that companies can still develop large solar arrays on forest/conservation land, and get the most amount of money for their solar credits, is because if the developer promises to use the credits for low income housing then they are allowed to develop on forest or important agricultural land.

Now is a time when we are all very concerned about global warming. Now is a time to build more solar on the huge amount of land that is **already** developed in

our state including brown fields, and rooftops, and highways, and parking lots, and on top of big box hotels, supermarkets, and malls. Now is also a time to gather our natural resources and hold them close. Keep a close eye on protecting them and allowing them to do their important job of carbon sequestration and growing crops. Please close the loophole that allows companies to take down forest land and to develop on important agricultural land if they promise to use the credits for low income housing developments. Instead incentivize the building of solar arrays over parking lots, on top of Walmarts, and Market Baskets. Incentivize the building of solar arrays on the edges of highways and on the roof tops of every house. Let's continue to look out for the "big picture" as we plan for the future of our planet.

I would also ask that Section D. regarding SREC II, which defines the Managed Growth Market Sector, be changed to codify DOER protection of Native cultural landscapes. In particular, I would ask that DOER add a specific prohibition as follows:

**"Generation units sited on parcels with known or suspected Native American landscapes, as identified by state or federally recognized tribes, are prohibited from receiving SREC II credits."**

The current site of the proposed ground mounted solar array in Shutesbury has suspected Native American artifacts on it, and there seems to be not much we can do to discourage the developers to build on these important artifacts. There are many places in Massachusetts that are of historical significance and need to be carefully protected. There should be more regulations around protecting historically significant lands. Thank you so much for considering my ideas. I love living in the woods of Massachusetts and hope that they will still be here cooling our planet and offering wonderful natural resources for many generations to come. I can be contacted at [andreacummings@hailmail.net](mailto:andreacummings@hailmail.net). Please email me with any questions you may have.

Andrea Cummings  
Shutesbury Massachusetts