

Ms. Kaitlin Kelly

Department of Energy Resources

100 Cambridge Street, Suite 1020

Boston, MA 02114

May 27, 2016

Dear Ms. Kelly,

I am writing to you about my concern regarding the SREC emergency regulation meeting that is coming up. Although I am a strong advocate of solar and renewable energy, I have concerns about where solar arrays are constructed. As a resident of Shutesbury, MA, we have recently 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 our town. Much of this small, rural, town is owned by Cows Lumber. They are currently looking to diversify their business model away from timber by 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. In addition, it is suspected that Native American burial sites are on this land.

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.

There is a loophole that allows SREC credits for large solar array development on forest/conservation land if the developer promises to use the credits for low income housing. Please close this loophole and incentivize the building of solar arrays over parking lots, land- fills, large, commercial and residential rooftops and on the edges of highways.

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 burial sites, as identified by state or federally recognized tribes, are prohibited from receiving SREC II credits." Along with Shutesbury, there are many places in Massachusetts that are of historical significance and need to be carefully protected.

Thank you for considering these concerns.

Sincerely,

Jane Costello

160 Pratt Corner Rd.

Shutesbury, MA 01072

janeannie24@gmail.com