



TOWN OF WEST TISBURY
CONSERVATION COMMISSION
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May 10, 2016

Land Use Planning Committee
Martha's Vineyard Commission
P.O. Box 1447
Oak Bluffs, MA 02557

Re: Concurrence. Review #1/DRI Oak Bluffs Water District Solar Farm
DRI # 660

Dear Committee Members,

The West Tisbury Conservation Commission (WTCC) offers the following comments and questions for your consideration during the concurrence review of a solar array proposal by the Oak Bluffs Water District. The proposal calls for the construction of a 3.09 +/- MW solar array with 4.17 acres of solar panels covering 8-10 acres of land with a cleared area of up to 20 acres on property containing wells 3, 4, & 5 in the Lagoon Pond Watershed Zone 1 and Zone 2 Areas of Contribution (the "solar array location").

The WTCC urges the Land Use Planning Committee to refer this project to the full Commission for a public hearing as a Development of Regional Impact. While this board is generally supportive of alternative energy projects, the WTCC has concerns about the proposed solar array location for the following reasons:

- 1.) Siting: The proposed solar array location abuts the Greenlands Water Resource Protection DCPC District in our town. In 1982, the Town of West Tisbury purchased 365 acres of land that is located over this aquifer to be set aside for conservation purposes for protection of the island's sole source aquifer from any development or activities that would have an adverse impact on the island's private and public drinking water supply.
- 2.) Wildlife Habitat and Landscaping: Of primary concern is the potential impact of deforestation and habitat fragmentation caused by the proposal to clear almost 20 acres of vegetation that is designated under the Massachusetts Endangered Species Act as priority habitat and is regulated by the Natural Heritage and Endangered Species Program.

We would like to call your attention to an email dated March 6, 2016 sent to the MVC from Dr. David R. Foster, Director of the Harvard University Forest. In his email he addresses his concerns for the destruction of forested areas on the Vineyard, "due to their critical role in carbon sequestration, habitat and the maintenance of water quality." As Dr. Foster points out, the forest targeted for clearing is part of ancient woodlands that provides a buffer to the adjacent State Forest which is the largest area of ancient woods on the Vineyard.

The proposal states that a solar farm seed mix, described as low-growing, low maintenance fescues, will be used under and around the solar panels. Unless this seed mix is comprised of

the fescue species identified as native in the "The Flora of Martha's Vineyard", this is not a native seed mix.

The proposed 6 foot high fence that would surround the solar array location will create a barrier to wildlife movement.

- 3.) Water quality: What is the potential impact on the water quality from storm water runoff? What will be the impact to recharge of the groundwater in the deforested area? How is it possible to insure that there will be no impact to the public wells that serve Oak Bluffs and Edgartown and to private wells in West Tisbury? Will the land under the solar panels be available for re-charge? Is data available that addresses the impact of solar arrays that have been placed in similar locations?

The MVC Staff Report dated 2016-02-3 raises very valid questions and concerns about this project which this board thinks deserves the consideration of the full MVC board.

Thank you for considering these concerns as you move through your review process.

Very truly yours,

West Tisbury Conservation Commission

By: _____
Tara Whiting, Chair