From:	Lori Kay
To:	SMART, DOER (ENE)
Subject:	RE: 400 MW Review Public Comments
Date:	Thursday, September 26, 2019 5:26:46 PM

September 26, 2019

TO: DOER
RE: Public Comments on SMART 400 MW Review

Thank you for the opportunity to comment on the SMART 400 MW Review.
I am commenting as a concerned citizen.

My husband and I purchased a home in Athol, Massachusetts in the Secret Lake development, in late 2016 after moving from rural Northern California to be nearer to our son and grandchildren. It was an ideal location, sited on a lake and surrounded by forests, wildlife and close to the Town of Athol that has begun to thrive again after experiencing an extreme economic downturn over many years.

Imagine our dismay and astonishment to discover a proposal before the Athol Conservation Commission for two 5 MW solar photovoltaic installations directly across the lake encompassing some 92 acres of forest and ridgeline; coming with 150 feet of the shoreline across the lake. It was at that point I began attending the Athol Conservation Commission meetings, the Board of Planning and Community Development as well as the Athol Selectman meetings to become more informed or at least get some understanding of why such a massive proposal was even possible. Unfortunately, what I have learned is that this can be laid squarely at the door of the SMART program as originally construed and that, (perhaps inadvertently,) SMART has actually served to *incentivize* commercial solar developers in pursuing forested and agricultural land i.e.: "Greenfields," as opposed to "Brownfields."

But as my education continued, I learned that our community is not alone, even in our small town of Athol many projects had already been approved under our existing bylaws, and worse, that because our town had enacted a solar bylaw; it made the surrounding forest land even *more* of a target for commercial solar developers. This has played out over and over across townships in Massachusetts particularly in rural areas where land is relatively cheap. And like so many other towns, the citizens of Athol were forced to take protective measures in the form of a moratorium on new solar installations until October 2020 to allow time to restructure our solar bylaws.

To follow are my comments on the future direction of SMART:

1. Remove the municipal bylaw loophole for Greenfield Subtractors
2. Increase Subtractor values to reduce subsidies for development of Greenfield sites
3. Increase Adder values to incentivize development of desirable sites (e.g. parking lot canopies)
4. Place more limitations based on land type, like those which were included in the initial SMART program straw proposal, but subsequently removed (e.g. Prime Farmland Soils, Prime Forest Land, BioMap2 Core Habitat and Critical Natural Landscape, Designated Priority Habitat of state-listed rare species, Land designated as "Forest Land" under Chapter 61)
5. Provide the solar array size cap in MW AC as well as MW DC
6. Consider solar siting when making grid improvements. Currently, high fixed costs for interconnection limit location of solar systems, and encourage large commercial solar developments
7. Create a more reliable incentive program; constantly changing incentives are just bad overall and especially onerous for municipal board decision-making

Thank you again for this opportunity to share my personal journey and experiences related to the SMART program.
I sincerely hope that DOER will revise the program regulations such that it takes considerations such as mine to

heart and will now more adequately address how solar is developed and deployed in the future.

Lori Kay
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