From:	Gillian Kellogg
To:	SMART, DOER (ENE)
Subject:	400 MW Review Public Comments
Date:	Sunday, September 22, 2019 8:22:37 PM

Gillian Kellogg
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Manchester, MA 01944

September 22, 2019

Dear Massachusetts Department of Energy Resources,

I am writing to comment on the Department of Energy Resources (DOER) review of the Solar Massachusetts Renewable Target (SMART) program. As an outdoor enthusiast, I am concerned that the SMART program has not been doing enough to direct new solar development to already developed and/or impacted areas. The clearing of forestland for new solar development is fragmenting our forests, destroying important wildlife habitat, degrading our scenic viewsheds, and changing the character of our rural communities.

I would like DOER to strengthen the SMART program requirements to avoid forest clearing. Since avoidance is not always feasible, DOER should be tracking the conversion of forest land for large ground-mounted solar development throughout the state to minimally be able to better understand and forecast impacts.

DOER should adopt siting criteria for all solar development, which takes into consideration wetlands, intact forests, core habitat, and state-listed rare species. A good example is the solar siting program developed by the New Jersey Department of Environmental Protection.

In order to facilitate appropriately sited solar development, DOER should increase adders or other incentives for co-locating solar facilities on already developed and/or compromised lands including but not limited to landfills, brownfield sites, abandoned mine sites, highway cloverleaf interchanges, gravel pits, sewage treatment plants and other similarly developed municipal lands, above parking lots, on large commercial building roofs, and on business and industrial park lands.

DOER should also work through its own Green Communities program and with statewide stakeholders to update its model solar bylaws to help towns increase solar development while protecting critical natural areas.

Thank you for the opportunity to comment on the Department's review of the SMART program.

Sincerely,
Gillian Kellogg