From: Mike Moros
To: SMART, DOER (ENE)
Subject: 400 MW Review Public Comments
Date: Monday, September 23, 2019 11:22:50 PM

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September 23, 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.
Now that solar panels are ubiquitous, we need to be cautious about further development. I have several concerns:
I. Unintended consequences
a. Sea level rise which is a feared consequence of climate change may be exacerbated locally by subsidence, especially near coastlines or if the degree is so large that inland development would also affect coastal areas. This may be an important area for study!
b. A second unintended consequence of the metal apparatus is that it might have a huge chilling effect in the winter. One of the only ways to offset this is to burn more fossil fuels, i.e. driving more, which it is agreed exacerbates climate change.

(I believe the climate has changed! i.e. it seems to rain more than it used to. But it has been very sunny in New England recently. If this trend continues, perhaps we can say the climate hasn't changed?)

II. Land that had prior been forest, or farmland, is being used for solar farms.
a. We really need to ask ourselves if this is wise?

III. In the Continental United States, the Southwest is the best place for solar.
a. Nevada, Arizona, New Mexico, West Texas, Southern California

IV. The South and West (except for the Pacific Coast and the Northern Rockies) are generally better than the Northeast.
I would like DOER to strengthen the SMART program requirements to avoid forest clearing and taking of agricultural land.
DOER should make the protection of natural areas a priority and should adopt siting criteria for solar development which takes into consideration wildlife habitat.
To facilitate appropriately sited solar development, DOER should increase incentives for locating solar facilities in places such as closed landfills, by sewage treatment plants, abandoned parking lots, commercial building roofs, and industrial parks.

Thank you,
Mike Moros