

Judith Judson, Commissioner  
Department of Energy Resources  
100 Cambridge Street, Suite 900  
Boston, MA

September 27, 2019

RE: SMART 400MW Review Comments

Dear Commissioner Judson,

I would like to address the draft proposal as it relates to significantly disincentivizing the use of vacant, undeveloped property for solar energy development. Carefully sited greenfield development can help expand renewable energy generation, while conserving land and ensuring the economic viability of our rural communities. I ask that you give serious consideration to the points I raise below.

First, while siting solar projects in parking lots, rooftops, and brownfields is laudable, limiting development to those locations only would significantly hamper Massachusetts' ability to meet its clean energy goals - goals which are a good start, but which fall far short of the aggressive steps the Commonwealth can and should be making to address the existential threat we now know that climate change reflects. Every day we have evidence that climate change is upon us and is advancing at an alarming rate. We cannot afford to dismiss greenfield sites with a blanket rule that essentially removes them from consideration for a program that is intended to accelerate solar development.

Second, the high cost of living in the Boston area puts unrelenting development pressure on outlying communities in Massachusetts. Landowners will have many opportunities to monetize their open space to development in the coming decade. The most vulnerable tracts of land are those adjacent to land already developed. Making such tracts less attractive to solar developers in turn makes these tracts more likely to be developed into housing and sprawl. These uses consume energy vs create it, and negate the good intentions of preserving open space. A better approach would be to allow developers to use some open space in exchange for preserving an equal or greater amount of undeveloped land through conservation restrictions.

Third, rural communities in Massachusetts struggle to fund their schools and services with a small economic base. These communities are rich in open spaces that appeal to tourists and outdoor enthusiasts, but the resources generated from visitors aren't nearly enough. The hope of a long-term revenue stream from solar developers has motivated citizens in many of these communities to invest time and money to establish solar by-laws that will position them to take advantage of this rare opportunity. The draft DOER proposal makes it likely that, despite strong local support, the opportunity will be lost for these communities

As a final note, I spoke to the above points at the review session held in Fitchburg. I'm a private citizen who learned about this review only in late August. The presentation made clear that this "straw proposal" had been developed throughout the spring and

summer with extensive input from “stakeholders.” It appeared that the Department was largely seeking endorsement vs. new input, as it had an accelerated schedule for emergency regulations.

I am one of the thousands of Massachusetts citizens who have enrolled in a community solar program with hopes of supporting clean energy. We are also stakeholders in the SMART program. I sincerely hope that the Department will be open to address the concerns I raise to promote cost-effective solar development in the Commonwealth as is consistent with the goals of the Program, and as is urgently needed to combat climate change.

Sincerely,

Elaine Mroz  
3 Riley Rd.  
Lunenburg MA 01462  
Cc: Sen. Dean Tran, Rep. Stephan Hay