

September 25, 2019

New Solar Start Trust  
PO Box 182  
Kingston MA 02364

Department of Energy Resources  
By email: [DOER.SMART@mass.gov](mailto:DOER.SMART@mass.gov)

**RE: 400 MW review public comments**

Dear Department of Energy Resources:

I write today on behalf of New Solar Start Trust to express our concerns about DOER's 400 megawatt review proposal. I am very concerned about the proposed changes around land use that, if enacted, would severely infringe on landowners' rights to steward their own lands as they deem fit.

My company hosts the 1.9-megawatt Spring Street community solar farm in Plympton. This site was originally proposed as a housing development but we hit significant problems during the 2008-2009 economic downturn. My company nearly ceased operations because of financial challenges. But we were able to partner with a solar developer and the site turned out to be well suited for this use. We are proud to note that our land now hosts a community solar farm, which helps to serve municipal and other customers who are unable to get on-site solar to meet their energy needs.

Solar development was an economic lifeline for us and our company, and we are concerned that the DOER's proposals would foreclose opportunities for other small landowners like me who wish to find a productive use for their land. Solar development not only provides lease payments to the landowner but also property taxes that help fund schools and social services as well as helps fight global warming.

One of the biggest concerns with the 400 megawatt review is the dramatic change of policy around the greenfield subtractor. To go from the current framework (where Category 1 projects are not subject to the subtractor) to the new proposal (where these projects will be subject to the subtractor, and that subtractor is a whopping five times the amount for Categories 2 and 3) is radical and extreme. We urge you to keep preferential treatment for projects that comply with local zoning, as this makes sense from a public policy perspective – DOER should encourage projects that meet local zoning criteria.

If DOER concludes that a greenfield subtractor is required, we strongly encourage you to not impose a five-times penalty, in favor of a smaller doubling of the subtractor. It is also vitally important that any changes to the subtractor take place in the SMART expansion and not in the

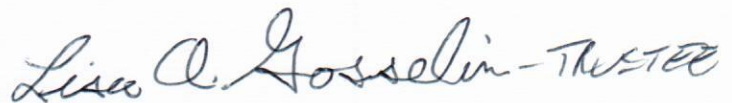
original 1,600 megawatt program. As a developer, we can tell you from experience that it can take many years to bring a project to fruition. It would be a poor business practice for Massachusetts to change the rules of the road on projects that are already well into development.

Finally, we wish to point out that forests are much more complex than many conservation groups would have DOER believe. In many cases, land that is classified as "forest" is actually of low quality, with patchy, immature trees. A great number of Massachusetts trees have been devastated by invasive species and it would be an environmental improvement to replace the diseased trees with species that are not susceptible to invasive species. Land clearing is also helpful to avoid fires.

Small developers like me invest our life savings, time and energy into our properties. DOER should be in the business of supporting and encouraging solar, but we are concerned that the 400 MW review proposals will actually drive developers away from solar and toward other, more environmentally damaging forms of development.

Thank you for your consideration of our views.

Sincerely,

A handwritten signature in cursive script that reads "Lisa A. Gosselin - Trustee".

Lisa A. Gosselin, Trustee  
New Solar Start Trust

Cc: Rep. Kathleen LaNatra  
Senator Vinnie deMacedo