

## SMART Public Comment

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To: SMART, DOER (ENE) <doer.smart@mass.gov>

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I am writing to comment on the Department's Emergency Regulations for the Solar Massachusetts Renewable Target (SMART) program. I thank the Department for listening to the concerns of many others and responding by adding the prohibition of solar energy development on land where at least 50 percent of the parcel's area is designated as Priority Habitat, Core Habitat, or Critical Natural Landscape, as well as developing a webmapping tool to help identify these areas.

Here are my comments:

- wetlands have already been decimated in the Commonwealth; allowing addition degradation with permission from local conservation commissions who may in fact be under staffed as well as under various pressure to accede to a push for energy even in inappropriate places concerns me.
- it would be useful to include properties not only currently in the State Register but also those under consideration to be off limits
- including permanently protected Article 97 open space in an ineligible category is an excellent improvement as is the inclusion as ineligible restricted conservation, agricultural or watershed land. However, loopholes appear to have been included and should be rethought and/or removed.
- Adders and subtractors don't go far enough in providing appropriate incentives and disincentives.

Finally, I am concerned that the Department proposes to combine Eversource East and West energy capacity blocks into a single service territory. Doing so will allow all of the solar development capacity for Eversource East in eastern Massachusetts to be sited in western and central Massachusetts, placing tremendous large scale solar development pressure on communities in the western and central parts of the state because the land is cheaper here and it is cheaper to build on green fields rather than parking lots.

Developers need to be compensated for spending more money on using parking lots and it should be prohibitively expensive to build on forest and farm land.

Thank you for the opportunity to comment on the Department's SMART emergency regulations.

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