

SMART Public Comment

Jonathan von Ranson <commonfarm@crocker.com>

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

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Please consider these comments on the Department's Emergency Regulations for the Solar Massachusetts Renewable Target (SMART) program.

First, the proposal to combine Eversource East and West energy capacity blocks into a single service territory seems contrary to good social and economic as well as environmental policy. Doing so will allow all of the solar development capacity for Eversource East in eastern Massachusetts to be sited in western and central Massachusetts, requiring more costly transmission capacity and wasting energy in the transmission process. It will also diminish the natural and historic appeal and the associated economic benefits of the communities in western and central Massachusetts.

In the formula for assessing the siting of solar fields, I feel it is important to increase the Greenfield Subtractor greatly, in keeping with the importance of such lands, and to calculate it based on the whole footprint of the development, not just the solar arrays.

In the latest draft of the regulations, I appreciate the prohibition of solar energy development where at least 50 percent of the area is designated as Priority Habitat, Core Habitat, or Critical Natural Landscape, as well as developing a webmapping tool to help identify these areas. Thank you!

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

Jonathan von Ranson
6A Lockes Village Rd.
Wendell MA 01379