

RE New Solar Language in the recent Energy Amendment

Cliff Carroll <capebanker@gmail.com>

Fri 5/29/2020 11:46 AM

To: SMART, DOER (ENE) <doer.smart@mass.gov>; capebanker@gmail.com <capebanker@gmail.com>; Alisa Magnotta Galazzi <alisa@haconcapecod.org>; David Quinn <dquinn@haconcapecod.org>; Peter Muise (Peter.Muise@firstcitizens.org) <Peter.Muise@firstcitizens.org>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

May 29, 2020

Department of Energy Resources,
Attn: Kaitlin Kelly
100 Cambridge Street, Suite 1020,
Boston, MA 02114

RE: Public Comment; SMART Emergency Regulations. Housing Assistance Solar Project in Sandwich, Massachusetts

To Whom It May Concern:

As a Mortgage Banker and Realtor on the Cape Cod and Islands for more than forty years, and as a longtime member of the Board for Housing Assistance Corporation, I am writing to request that DOER amend the new Emergency regulations so that they do not block a solar project in an industrial area of Sandwich which has strong local support and years of development already invested. The Town and the region want this solar farm in Sandwich and Housing Assistance has made all the necessary investments and has demonstrated a deep commitment to environmental best practices.

The two fixes proposed are:

- Amend the language of the emergency rule making to clarify that any new sighting-related regulations are applicable only to projects qualifying for Capacity Block 9-16. This will eliminate the harmful impact on projects currently under development in the Eversource East territory that have been working under the understanding of the previous regulations.
- Expand the grandfathering exception under the new rules for projects that reasonably should have had their ISA's by the Emergency Regulations Publication Date, if the utilities had been processing applications in their regulated time frames. This clause would be applicable to projects with interconnection applications prior to approximately October 15, 2019.

This property is sandwiched between a residential zone and an industrial zone, which makes a solar farm an ideal low-impact use of the land with no other prospects. It was on track for approval and would already have been in progress had it not been for delays over which Housing Assistance had no control. However, this project will no longer be viable under the siting regulations in the new emergency rules that prohibit development in a Critical Natural Landscape Block ("CNL").

Housing Assistance has invested many years, significant staff time, and substantial financial resources for solar consultants and legal review in working with the town of Sandwich to develop a project that benefits the region, the town and the agency. Ending this project now would be a huge financial loss to the agency, which serves an average of 5,000 low- and moderate-income residents across Cape Cod each year.

As a Realtor with decades of experience, I cannot think of a more appropriate development that could be proposed for this site than the solar farm project. It's a win for the environment, the town and our neighbors in need who for over 40 years have relied on the Housing Assistance Corp. to stay safely housed.

Sincerely,

Cliff Carroll

President/CEO

The Carroll Company

Carroll Commercial Inc.

P.O. Box 5

Osterville, MA 02668

Office: 508-771-2000

Cell: 508-685-4567

capebanker@gmail.com