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Department of Energy Resources  
100 Cambridge St., Suite 1020  
Boston, MA 02114  
attn: Kaitlin Kelly

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VIA email attachment to DOER.SMART@mass.gov "SMART Public Comment"

I write to address my concerns on the Department's Emergency Regulations for the Solar Massachusetts Renewable Target (SMART) program. My concerns are for the small communities with limited professional staff in their Planning and Conservation offices. The increase in projects hastily submitted in the hopes of reaping large profits provided by SMART program incentives will result in poorly considered projects such as the solar array in Williamsburg, MA that has destroyed a local fish habitat and is the focus of a legal action by the Attorney General's Office.

The decision to combine Eversource East and West energy capacity blocks into a single service territory will put a tremendous burden on the volunteer members of the western region's Planning Boards and Conservation Commissions. All the solar development capacity for Eversource East will be sited in western and central Massachusetts. This is an unreasonable situation for smaller communities to be saddled with.

Additionally, I would like the Department to make the Greenfield Subtractor five or ten times the current level and apply the subtractor to the whole footprint of a proposed development, not just the ground beneath the solar arrays. The subtractor should make this development cost prohibitive.

Cutting old established forest land for solar panels is not a good trade. It contributes to fragmented forests, reduces local opportunities for snowmobiling, hiking and hunting.

Clean energy is supposed to protect against mining, drilling and destruction of natural ecosystems. Destruction of undeveloped farm land and extensive forests for the siting of solar arrays does not make sense. Every mall parking lot and roof top should be covered with solar panels before any agricultural or forest land is lost to commercial solar projects.

Thank you for your consideration.

Sincerely,

Sean B Tarpey