

SMART Public Comment

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

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To the Department of Environmental Resources:

We are writing to comment on the Department's Emergency Regulations for the Solar Massachusetts Renewable Target (SMART) program. We thank the Department for listening to the concerns of AMC and 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.

Additionally, we would like the Department to increase the Greenfield Subtractor by at least five times over its current level and apply the subtractor to the whole footprint of the development, not just the solar arrays.

Finally, we are 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 solar development pressure on communities in the western and central parts of the state.

My wife and I feel strongly that solar installations should be sited on industrial and big box store rooftops or abandoned parking areas where no logging is necessary to realize the benefits of renewable technology.

Don't make the mistake that the DCR is making by assuming that trees are a renewable resource. We need both healthy, uncut forests and renewable solar and wind energy. Wood is not renewable in the time frames dictated by the climate emergency we face.

Sincerely,
Christopher and Alys Queen
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Wendell, MA 01379