

## comments regarding SMART rules

Henry Geddes <geddes@comm.umass.edu>

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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 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, I 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, 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 solar development pressure on communities in the western and central parts of the state.

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

Henry Geddes PhD  
Associate Professor  
Communication Department  
University of Massachusetts Amherst  
Amherst, MA 010030