



**CITY OF CAMBRIDGE**  
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sent via email

Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

July 11, 2017

***Re: SMART Comments***

To Whom It May Concern:

The City of Cambridge Water Department (CWD) appreciates the opportunity to comment on 225 CMR 20.00, regulations filed for the Solar Massachusetts Renewable Target (SMART) Program. The City of Cambridge receives its drinking water from a 24 square mile urban watershed, which includes the salt impacted Hobbs Brook Reservoir. Incentives for solar canopies present a unique opportunity to both generate renewable energy and improve water quality in the Cambridge watershed.

Open parking areas in commercial developments use significant quantities of deicing chemicals, such as sodium chloride or calcium chloride, to maintain safe winter conditions. In the Cambridge watershed, many developments are required to use sand instead of conventional deicing chemicals to minimize sodium and chloride concentrations in drinking water sources. While sand does not contain sodium or chloride, it presents its own water quality, aesthetic, and management challenges. Solar canopies shelter parking areas during winter storm events, and have the potential to greatly reduce the amount of salt and sand applied during the winter months. Anecdotally, an early adopter of parking lot solar canopies in the Cambridge watershed has observed a decrease in the quantity of deicing materials used during winter storms.

While many strategies exist to reduce parking lot runoff and to reduce pollutant loading, few of these strategies have the co-benefit of producing renewable energy. Therefore, the Department should consider the potential improvement to source water quality from reduced loads of deicing materials when setting the Location Based Adder Rate (225 CMR 20.07(4)(a)) for parking lot solar canopies.

Please note that these comments should be seen as complementary to the SMART straw proposal comments submitted to DOER by the City of Cambridge on October 28, 2016 and the emergency regulation comments being submitted by MAPC on behalf of Cambridge and other member cities on July 11, 2017.

Sincerely,

A handwritten signature in blue ink that reads "Jamie O'Connell". The signature is written in a cursive, flowing style.

Jamie O'Connell, Watershed Protection Supervisor, CWD

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