

**From:** Kirt Mayland [mailto:[dkm@soltasenergy.com](mailto:dkm@soltasenergy.com)]  
**Sent:** Friday, August 23, 2013 10:36 AM  
**To:** SREC, DOER (ENE)  
**Cc:** Judge, Michael (ENE)  
**Subject:** Soltas Comments

To Whom It May Concern,

Approaching 20 MW of pv development under operation, Soltas is one of the largest rooftop and ground-mounted solar pv developers (that builds, funds, owns and operates) in the state of MA. We recently finished the largest ballasted rooftop system in the state and have nearly 14 MW under active construction at the moment.

We appreciate the direction the DOER is going with the new regulations surrounding SREC 2. In particular, we support its efforts to disincentive ground-mounted solar pv on valuable forestland and farmland. We do have a concern with the category regarding "brownfields" and landfills, however. There is no definitive definition of what a "brownfield" is. For instance there is an internal list that MA DEP has that they call brownfields. Although they are not even sure if their list is based on regulation.

It is our understanding that MA DEP is working on a list of sites they consider suitable for solar, but limiting this list to brownfields and landfills does not really go far enough as detailed below.

Regardless of these efforts, there seem to more sites in the state that would be ideal (for towns, the environment, developers, residents, etc.) for ground-mounted solar even if they do not fit the generic definition of a brownfield: "real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant." For instance abandoned or closed gravel, sand, aggregate ,etc. pits would be ideal for solar. They are generally shielded from any nearby residents per prior permit conditions, are environmentally vacant, and have no further economic value to towns or the landowners. Frequently they are full of invasive species. Putting solar there is an ideal scenario - perhaps even better than a classic brownfield - as these tend to be in areas where towns would prefer "job-creating" industries. These abandoned pits really should either be included in the DOER definition of brownfield, or be given their own category. Based on our extensive experience in the state, there is no better spot for a solar field.

If the definition of brownfields is expanded or more inclusive of old industrial/commercial properties with certain characteristics like abandoned pits, we would wholly be in support of the new regulations.

We appreciate the efforts of DOER to make the SREC II program more environmentally sustainable while at the same time promoting the robust development the industry has experienced in the past 2 years in particular.

Sincerely,

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