Dumaine, Julia

From: Margaret Miner <margaret.miner@charter.net>
Sent: Saturday, July 24, 2021 9:16 AM
To: DEEP STEPS
Cc: Wingfield, Betsey; alicea; margaret.miner@charter.net
Subject: FW: oops Comments on STEPS

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear DEEP: Please use text below, from today. July 24, 2021. Last night's text, from July 23, contained annoying typo in first sentence.
Thanks for your help, Margaret 203-788-5161

TO DEEP:
I attended very informative meetings on 1) solar siting and environmental considerations and 2) on solar siting in underserved neighborhoods.
Thank you accepting the following comments. Please let me know if I need to submit them in some other form or have otherwise blundered.

Solar siting and environmental considerations:
I strongly second all comments that stressed the importance of moving siting decisions to the very beginning of the process. At the same time that authorities are asking whether the applicant is solvent, they should be asking where the applicant intends to install the facility. The first STEP should avert controversy and dissension down the road. Cost should not trump success.
I also second the comments questioning the use of the Petition Process for applications for renewable energy projects. THE ELIMINATION OF THE NEED TO SHOW ENVIRONMENTAL COMPATIBILITY SENDS THE UPFRONT MESSAGE -- ENVIRONMENTAL CONCERNS COME LAST IF AT ALL. No amount of tinkering with what Council members are supposed to "consider," or new criteria for discharge permits, can overcome that initial, overt bias against hearing about environmental issues. The merger of the former DEP and energy entities into DEEP should lead to compatible policies for energy and natural resources, not policies that pit people against each other.

Solar in Environmental Justice Communities.
I believe it was in this session that a solar ceo recommended that DEEP have different processes for community solar versus larger solar tied into the grid. Sounds like a good idea. Canopies also were discussed at some length; also sounds like a good approach.
The question of the cost of canopies and costs in general left me the queasy feeling that these communities might not get the top-of-the-line, best-built, best-performing installations. I didn't hear requirements on those factors. Installations in poor

neighborhoods ought to have fair but strict rules for performance, repairs, and decommissioning. When a predictable but "unprecedented" storm damages or destroys solar arrays in an area, it should not be the case that the suburbs are cleaned up first and the inner city is left with debris-laden lots. It should not be the case that, after 20 years, the arrays in poor neighborhoods begin to fail or deteriorate prematurely. In general, MUCH MORE ATTENTION SHOULD BE GIVEN TO LONGEVITY AND DECOMMISSIONING. Neighbors should know what materials (including toxins) are present in a facility and how these materials will be safely managed and disposed of.

Thanks for your attention,
Margaret Miner, environmental consultant

203-788-5161