From:	PL/Judith Mann
To:	SMART, DOER (ENE)
Subject:	400 mw public comments
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Attachments:	doer kaitlin kelly.docx

Dual submission: Please read attachment, as well as body of this email

Misleading Headline?

If articles had headlines that read: 'Forests Slow Climate Change', it would have clarified the comments made by large scale solar developers, as distinct from local installers, to attract investors with huge profits, despite the consequences. Large arrays may bring investment potential, but not necessarily efficiency. The drastic land use change required, via clear cutting, uprooting and bulldozing vast tracts, is not offset by planting meadow grass. There is no reason that forested land 'must be developed', or that solar arrays are the best option, or evidence that forests will 'fully recover once the panels are removed'. Current research at UMass and the Harvard Forest does not support this claim. The 2016 statistics on land use and availability predate the flow of commercial applications (a response to State incentives, intended to promote highly beneficial, smaller scale community and residential solar). What about the numerous utility scale projects approved and awaiting construction, or the associated 'benefits' from the disruption of wildlife and watersheds, erosion, and neighborhood power surges and brown outs? When there is waste and disturbed land available, is there any good reason to cut trees? .

As towns are flooded with project applications and struggle to write new bylaws, the industry's attorneys cry Fowl! if towns swiftly approve small installations, but deny permits for poorly sited, over size, and badly designed projects. Then towns face protracted hearings, threat of lawsuits, appeals and complaints, and calls for rescinding of limits on cutting in tandem with increased incentives – a truly eye-opening list. The State has 'discouraged' rather than prohibited deforestation, and is revisiting biomass, the cutting of 'renewable' trees for fuel – doubling the carbon penalty, endangering natural climate protection, and increasing pollution. Real analysis of these issues is needed, but shouldn't it rely on science, and not unchallenged industry hype?

Sincerely, Judith Mann

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