From: John Lombard
To: SMART, DOER (ENE)
Subject: 400 MW Review Public Comments
Date: Wednesday, September 25, 2019 8:42:05 PM

John Lombard
39 Munroe St
Northampton, MA 01060

September 25, 2019

Dear Massachusetts Department of Energy Resources,

I am writing to comment on the Department of Energy Resources (DOER) review of the Solar Massachusetts Renewable Target (SMART) program.

Living in western MA and witnessing the transformation of hundreds of acres of our forested and farmed land to solar arrays in recent years, all while potential sites for solar on already developed land go untapped, I am deeply concerned that these proposed SMART changes do not sufficiently address poor siting.

I would like DOER to strengthen the SMART program requirements to avoid forest clearing. Since avoidance is not always feasible, DOER should be tracking the conversion of forest land for large ground-mounted solar development throughout the state to minimally be able to better understand and forecast impacts.

DOER should adopt siting criteria for all solar development, which takes into consideration wetlands, intact forests, core habitat, and state-listed rare species. A good example is the solar siting program developed by the New Jersey Department of Environmental Protection.

In order to facilitate appropriately sited solar development, DOER should increase adders or other incentives for co-locating solar facilities on already developed and/or compromised lands including but not limited to landfills, brownfield sites, abandoned mine sites, highway cloverleaf interchanges, gravel pits, sewage treatment plants and other similarly developed municipal lands, above parking lots, on large commercial building roofs, and on business and industrial park lands.

DOER should work through its own Green Communities program and with statewide stakeholders to update its model solar bylaws to help towns increase solar development while protecting critical natural areas.

All SMART applications received from the first release of straw proposal recommendations (9/5/2019) should be required to comply with the new land use regulations.

Finally, there needs to be a permanent solar advisory group--made up of diverse stakeholders--that provides feedback to DOER regarding solar siting, solar incentive structures, the solar energy market, and related topics.

Thank you for the opportunity to comment on the Department's review of the SMART program.

Sincerely,
John Lombard