



September 27, 2019

RE: MassDOER 400 MW Review Public Comments

MassPLAN is a statewide organization whose mission is to empower communities to oppose unneeded natural gas infrastructure and help shape a clean energy future for Massachusetts. Our membership includes planning board and conservation commission members. We are submitting these comments on the SMART program 400MW review straw proposal for issues that have an impact on municipal government, the environment, and our goal of a clean energy future for the Commonwealth. We are dismayed when, biweekly, the MEPA Monitor notifies the Commonwealth of yet another solar project proposed with such adverse environmental impacts that it requires a MEPA review, Environmental Impact Report, wetland replication and/or restoration plan, rare species management and conservation plan, or any combination of these measures that mean it really isn't an appropriate or permissible site.

Our recommendations:

DOER should adopt siting criteria and best management practices for all solar project construction with additional requirements when any portion of a project is greenfield and impacts sensitive environmental features of the site.

DOER should adopt adders to better incentivize solar siting on already developed properties, brownfields, buildings, parking lots, etc.

DOER should adopt adders to better incentivize solar paired with storage projects.

DOER should adopt subtractors that appropriately steer projects away from greenfield development, with additional subtractors for greenfield development that includes rare species habitat, biomap2 core habitat, permanent wetland impacts. DOER should consider a policy that rare species habitat can never be impacted.

DOER should properly count impact acreage as the total on-the-ground impacts, not just the surface area of the solar panels themselves. DOER should work with MassGIS to track solar installations as a publicly available datalayer.

DOER should create a program to support municipality solar zoning with technical staff and model zoning bylaws available for multiple municipality types and sizes. DOER should remove all regulations that allows solar developers to claim exemptions from zoning bylaws, or promulgate a policy where no zoning exemptions are allowed.

Respectfully submitted,

Kathryn R. Eiseman
17 Packard Road
Cummington, MA 01026
(413) 320-0747
katyeiseman@gmail.com

Cathy Kristofferson
244 Allen Road
Ashby, MA 01431
(978) 204-3940
cathy.kristofferson@gmail.com