

SMART Public Comment

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To: SMART, DOER (ENE) <doer.smart@mass.gov>

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Dear Commissioner,

Along with our neighbors, as residents and taxpayers of Massachusetts, we would like to express our opposition to the DOER rule change that disqualifies land identified as "priority habitat" from the SMART program.

We believe this change in the rules is a bad decision which will hurt our towns, our renewable energy opportunities, and our conservation goals.

Our town passed comprehensive laws regulation solar energy development, specifically designed to minimize impacts on scenic, natural and historic resources, while supporting renewable energy and providing vital town revenue. Prohibiting our landowners from using their properties for solar farms, the least impactful development compared with residential and higher impact commercial, makes no sense. From a conservation or endangered species protection standpoint, when one could otherwise put a multi-lot subdivision on the land, solar versus the alternative is a no brainer. With solar you end up with renewable energy, town and landowner revenue and a meadow environment, not more houses in need of increased town infrastructure, schools and energy usage.

For the town, in the case of one project with planning and almost all permitting satisfied, this disqualification, if the DOER rule change is allowed to stand, will cause the loss of 250 jobs, an estimated \$4 million in vital town revenue and conserved acreage about three times the amount required for the project footprint. Taking away this project's qualification for the SMART program will hurt the town and its residents, remove 20 MW/annually of renewable energy from the state's generation ability and put 400+ acres of land under pressure for more invasive development. Similar losses for multiple towns will have a very detrimental effect on the Commonwealth.

We ask that you please rescind this disqualification of priority habitat and return the requirements to the original rules. We believe the consideration for such action to have been insufficient and not in the best interests of our towns' and the state's needs.

Thank you for your consideration and action.

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