

## SMART Public Comment

WILLIAM ZINNI <billzinni@comcast.net>

Mon 6/1/2020 6:29 PM

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

Cc: lucas.mcdiarmid@masenate.gov <lucas.mcdiarmid@masenate.gov>; anne.gobi@masenate.gov <anne.gobi@masenate.gov>; donald.berthiaume@mahouse.gov <donald.berthiaume@mahouse.gov>

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Attention: Kaitlin Kelly, DOER  
SMART Public Comment

Dear Ms. Kelly:

Thank you for visiting us over the last couple of years to discuss the State's SMART program, and the solar development situation in our central part of the Commonwealth. You attended one of our coordination meetings, facilitated by the East Quabbin Land Trust, in which neighboring towns wanted to share information and better understand the increasing pressure for solar development in our part of the state. I am a land owner and resident of the Town of Hardwick, a recently-retired biologist (U.S. Fish & Wildlife Service), current Chair of Hardwick's Conservation Commission, and a committee member of the Land Trust.

Many of us are supporters of alternative energy programs and improvement of the electrical grid, concerned about issues such as climate change. We applaud our state's efforts to implement alternatives to continued dependence on fossil fuels. However, I am writing to officially repeat a frustration and concern many of us on town boards and local land trusts have been developing over the last couple of years. I have been reminded that today is the deadline for public comment on updates to the state's SMART program. I may borrow some language from on-line alerts going around, since I have limited time to comment, but please understand that these are my opinions also.

I wish to reinforce the comment that "The Commonwealth must prioritize rooftop solar development and ensure that the forests and farmland MA land trusts (and Commissions such as ours) have worked to conserve remain protected." I would like it understood that Hardwick, and some of our surrounding towns, are historically agricultural towns .... and that I particularly have a problem with soils classified as prime agricultural soils (by the USDA's Natural Resources Conservation Service, formerly Soil Conservation Service) being squandered for large-scale solar development ..... just because they may be open lands most easily/inexpensively developed. Especially at a time in our nation's history when it may be extremely important to preserve some ability to be self-reliant, i.e. the ability to grow food locally, in a self-sustainable manner.

I add my voice to those urging DOER to revise the SMART program to avoid, or significantly reduce, the amount of prime farm- and forestland soils being converted to large-scale ground-mounted solar arrays, and to better align this program with other Commonwealth programs and goals including the Executive Office of Energy and Environmental Affairs Resilient Lands Initiative and implementation of the State Hazard Mitigation and Climate Adaptation Plan (SHMCAP). Many of us have been working to

ensure forest connectivity across the landscape, as one means of helping enhance climate change resiliency for many of the state's plant and animal species.

Existing financial disincentives to develop solar projects on our better agricultural and forest soils should be increased above the current level in a meaningful way, and applied to the entire footprint of any given proposal. For any "greenfield development", MassWildlife (MDFW), the MA DEP, and Massachusetts Endangered Species Act (MESA) review should be consulted early, with respect to solar proposals. I agree that Solar developments that provide electricity to public entities should be subject to BioMap2 restrictions, designated as Category 2 land, and they should not qualify as Category 1 land.

I would also like to voice my opinion that, for many of us citizens of the Commonwealth that volunteer time to participate on town boards, the rapid onslaught of commercial solar projects has been a major frustration. While it may have seemed like a great idea to incentivize and encourage solar development, from the Administration's point of view, many unprepared rural towns are suffering to fulfill review responsibilities with the rapid increase in solar development pressure.

I would like to add my voice to request that the MA Department of Energy Resources (DOER) give very serious consideration to prioritizing large-scale solar development away from our prime agricultural and forestland soils. Greater incentives should be provided to encourage the development of solar projects on other already-developed situations, such as rooftops, parking lots and garages, malls, highway cloverleafs, capped landfills, and other altered areas.

Finally, I support the state's inclusion of land-use siting guidelines that will prohibit solar energy development where at least 50 percent of the parcel's land area is designated as Priority Habitat, Core Habitat, or Critical Natural Landscape as identified in BioMap2. This prohibition should remain in the land use siting guidelines.

Thanks for the opportunity to provide comment, and for the good work that DOER does on behalf of us citizens.

William Zinni Jr. (Bill)  
1232 Turkey Street  
Hardwick, MA 01037  
billzinni@comcast.net  
(413) 477-0291  
(P.O. Box 83, Ware, MA 01082)