

SMART Public Comment

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Thu 5/21/2020 2:51 PM

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

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Dear Commissioner,

As a resident and taxpayer and licensed professional engineer in Massachusetts, I would like to express my opposition to the DOER rule change that disqualifies land identified as "priority habitat" from the SMART program. This rule change is a bad decision that has negative consequences for renewable energy opportunities and the preservation of rural land.

Many rural landowners are faced with the dilemma of constantly sub-dividing land in order to meet property tax levies, even when family members do not want more development. The ability to put woodland to use for solar energy generation is the lifeline that permits these landowners to maintain as much of their land as possible in its natural state by covering real estate taxes with income from land that will be lightly developed for a 20 to 25-year period, after which the land can revert to its original or similar use.

Due to visual impact of solar farms, extensive screening is needed along roadways and most towns have passed local bylaws requiring it. All the more reason to be able to access back land, away from the roadways. Unfortunately, these areas are more likely to be located within priority habitat areas. But solar farms have been dealing with NHESP for years designing ways to minimize disturbance to endangered species, such as leaving 6 inch clearance under fences and avoiding topographic restrictions to wildlife movement and migration paths. These methods have allowed solar projects to be completed with minimal impact in most cases. In cases where impacts could not be sufficiently mitigated, landowners could provide financial support to NHESP initiatives on other sites.

If DOER restricts the use of land in priority habitat for the SMART program, many landowners will be forced to develop it in much more intensive ways. Please re-consider this rule change in light of the un-intended consequences it creates.

Respectfully,
Rick Charon, P.E.
Rochester