

SMART public comment

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Comments on emergency regulations to SMART:

Please prioritize natural resources over large scale solar development.

I am encouraged to see land use siting guidelines that prohibit solar energy development when at least 50 percent of the parcel's land area is Priority or Core Habitat, or Critical Natural Landscape as identified in BioMap2.

I urge DOER to revise the SMART Program to avoid or significantly reduce the amount of forests and farmland that are being converted to large-scale ground-mounted solar arrays. This will align this program with other MA programs including MA EEA Resilient Lands Initiative and implementation of State Hazard Mitigation and Climate Adaptation Plan.

The "Greenfield Subtractor" financial disincentive to build on forests and open space, should be increased to five times its current level and applied to the entire footprint of a project to further discourage development on greenfields.

For any greenfield development MassWildlife, the MA DEP and MA Endangered Species Act review should be brought in early rather than at the 11th hour.

Solar developments that provide electricity to public entities should be subject to BioMap2 restrictions, designated as Category 2 land, and not qualify as Category 1 land.

DOER should add to its criteria of locations where solar development is prohibited, land that is on Municipal Vulnerability Program maps, as these sites are vulnerable to hurricane storm surges and are potential flood areas due to sea-level rise, as well as being habitat migration pathways.

Greater incentives should be provided to encourage development of solar on rooftops, parking canopies, highway cloverleaves and other disturbed areas. The National Renewable Energy Lab estimates that over 40,000 acres of rooftops are suitable for solar development in Massachusetts.

Thank you for the opportunity to comment.

Kathleen McGrath

Rollingwood Ln

6/1/2020

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