

## SMART Public Comment

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

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MA DOER,

Thanking the DOER for including "land-use sitting guidelines", that prohibit the destroying certain Natural Landscapes, is like thanking the mafia for cutting off only one arm.

1. Your DOER web site data reports Solar has having a "capacity factor" of only 13.35%. The land that you destroy with your large-scale solar arrays is fenced in 100% of the time. The "grid" must burn natural gas 86.65% of each day to compensate for the inept, intermittent nature of this "renewable" generation.
2. Solar generation will never supply the "grid" with reliable, steady, dispatchable current. Solar installations must be limited to reducing "demand". "Behind the Meter" installations on rooftops, landfills etc. will reduce demand, but killing the forest trying to "save the environment" is the legacy of the MA DOER.
3. The world is suffering from a Covid-19 Pandemic and the MA DOER is enacting "emergency" regulation to replace our reliable US sourced natural gas "grid" with a Chinese sourced intermittent, unreliable solar & wind nightmare.
4. Had enough of my generalized insults? Here is a more "politically correct" comment.

## Protect MA Forests from Large-Scale Solar Development

Did you know that a plan by solar developers estimates the clearing of 70,000 of forests throughout the state of Massachusetts for large-scale ground-mounted solar development? At the same time a report by the National Renewable Energy Lab estimates that over 40,000 acres of rooftops are suitable for solar development in Massachusetts. The Commonwealth must **prioritize** rooftop solar development and ensure that the forests and farmland MA land trusts have worked so hard to conserve remain protected!

Please tell the MA Department of Energy Resources (DOER) to prioritize land conservation over large-scale solar development! Written comments are due by June 1, 2020. You can submit comments electronically to [doer.smart@mass.gov](mailto:doer.smart@mass.gov), and include "SMART Public Comment" in the subject line.

Key points to make in your comments.

We are encouraged by 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.

We urge DOER to revise the SMART program to avoid, or at least significantly reduce, the amount of forests and farmland that is 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).

The "Greenfield Subtractor," which is the financial disincentive to build on forests and other open space, should be increased to five times its current level and applied to the entire footprint of the project (not just the solar arrays), to further discourage development on such greenfields.

For any greenfield development MassWildlife, the MA DEP and a Massachusetts Endangered Species Act (MESA) review should be brought in early not at the 11<sup>th</sup> hour.

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.

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

Greater incentives should be provided to encourage the development of solar on rooftops, parking canopies, highway cloverleaves and other distributed areas.

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