

SMART Public Comment

Ed Hood <ehood@opacumlt.org>

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

Cc: Donald.Berthiaume@mahouse.gov <donald.berthiaume@mahouse.gov>; Gobi, Anne (SEN) <anne.gobi@masenate.gov>; Smola, Todd - Rep. (HOU) <todd.smola@mahouse.gov>

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These are comments in regards to proposed DOER regs for the SMART program.

Meeting Massachusetts' and broader renewable energy goals is critical for mitigating climate change and protecting the economic well-being and health of the Commonwealth's residents. But In the 5-year period from 2012 to 2017, due in large part to subsidies provided by the Commonwealth of Massachusetts, 6,000 acres of undeveloped land (primarily forest and farm land) in Massachusetts were converted to ground-mounted solar arrays (MassAudubon, *Loosing Ground*, 6th Edition). A large percentage of this conversion took place in central and western Massachusetts, taking advantage of the lower land values of this still largely rural region.

The loss of habitat, biodiversity and ecosystems function resulting from the permanent conversion of forests and BioMap2 Priority and Core habitats solar arrays is simply not an acceptable strategy for meeting renewable energy targets. Such an approach is "two steps forward and one, or perhaps even two, steps backwards". Rather than incentivizing the conversion of forest and farmland to commercial solar arrays, public funding should instead be used to incentivize solar arrays on rooftops, parking canopies, highway margins and other locations that do not provide ecosystems functions that are equally important for mitigating climate change and maintaining biodiversity.

Please eliminate or further reduce any incentives that subsidize the conversion of any BioMap2 Priority and Core habitats, or other healthy forest and farm land, to commercial solar arrays

Please shift incentives away from natural land conversion and instead incentivize brownfield and other hardscape siting of solar arrays.

Thank you,

Ed Hood
201 Jackson Rd. / P.O. Box 245
Hardwick, MA
413-477-1061

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