

SMART Public Comments

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

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Ethel White
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May 31, 2020

Dear Massachusetts Department of Energy Resources,

I am writing to comment on the Department's Emergency Regulations for the Solar Massachusetts Renewable Target (SMART) program. I thank the Department for listening to the concerns of AMC and many others and responding by adding the prohibition of solar energy development on land where at least 50 percent of the parcel's area is designated as Priority Habitat, Core Habitat, or Critical Natural Landscape, as well as developing a webmapping tool to help identify these areas.

I am disturbed that there is not more protection for existing woodlands when it comes to siting solar. It makes no sense to incentivize solar as a means of reducing atmospheric carbon if more carbon is released to develop a site.

Research demonstrates that mature trees are essential to carbon sequestration, so they must be conserved, not cut down to allow ground mounted solar development. This applies also to working farms where soil building likewise sequesters carbon. The "Greenfield Subtractor" must be increased to five times its current level in order to discourage development in these areas.

There are acres of roofs and parking lots calling out to be shaded by solar panels. This is where the new solar development should be prioritized.

Sincerely,
Ethel White