

SMART Public Comment

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The following is a direct quote from guidance found at <https://www.mass.gov/files/documents/2016/08/nc/model-solar-zoning.pdf>

Model Zoning for the Regulation of Solar Energy Systems
Department of Energy Resources
Massachusetts Executive Office of Energy and Environmental Affairs
December 2014 :

"Siting Preferences

Where a solar facility is sited, as well as placement on the site once selected, is an important consideration, particularly in regard to large-scale ground mounted facilities. DOER strongly discourages locations that result in significant loss of land and natural resources, including farm and forest land, and encourages rooftop siting, as well as locations in industrial and commercial districts, or on vacant, disturbed land. Significant tree cutting is problematic because of the important water management, cooling, and climate benefits trees provide.

In regard to farm properties, rooftops are preferable. If roof space is inadequate non-productive, non-arable agricultural land is the second choice. Should this also prove infeasible or inadequate a dual use of land design concept could preserve productive farmland by continuing crop production underneath high-mounted and well spaced panels. Finally, if none of these are feasible or they are inadequate the least productive land should be used first to minimize the loss of productive food/crop land. "

Surely DOER programs should be consistent with this, i.e. SMART should "strongly discourage locations that result in significant loss of land and natural resources, including farm and forest land,"

Using Biomap 2 is a reasonable step in this direction, but "strongly discouraging" requires that SMART either disallows forest and farmland consuming projects altogether or at least incorporates a much more powerful tariff reduction for such projects. Keep in mind that disallowing a project from SMART does not bar the project, it merely states DOER will not encourage it via subsidies.

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