

## Public comment--SMART regulations

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

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As concerned citizens and owners of roof-top solar ourselves, we fully support the state's rapid conversion to clean energy. However, as resident of western MA, we have witnessed our landscape, including core habitat, significantly deforested over the past 5 years by large scale solar development.

We attended several public comment sessions by the DOER, and appreciate that they have listened to our concerns 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 an online tool to help identify these areas. We fully support these changes.

We ask that the DOER increase the Greenfield Subtractor by at least five times over its current level and apply the subtractor to the whole footprint of the development, not just the solar arrays.

Finally, we are concerned that the Department proposes to combine Eversource East and West energy capacity blocks into a single service territory. Doing so will allow all of the solar development capacity for Eversource East in eastern Massachusetts to be sited in western and central Massachusetts, placing tremendous solar development pressure on communities in the western and central parts of the state.

Please strengthen incentives and disincentives to properly site our state's solar energy production, and help preserve our remaining intact habitats which play a critical role in climate mitigation and resilience as well as species survival.

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