

June 1, 2020

Mr. Patrick Woodcock, Commissioner  
Department of Energy Resources  
100 Cambridge Street #1020  
Boston, MA 02114

RE: Proposed Changes to Regulations

Dear Commissioner Woodcock:

Along with our neighbors, as residents, taxpayers and landowners of Massachusetts, I would like to express my opposition to the DOER rule change that disqualifies land identified as "priority habitat" from the SMART program. I believe this change in the rules is a bad decision which will hurt our towns, our renewable energy opportunities, and our conservation goals.

The Town of Mattapoisett has comprehensive laws regulating solar energy development, specifically designed to minimize impacts on scenic, natural and historic resources, while supporting renewable energy and providing vital town revenue. Prohibiting landowners from using their properties for solar farms, the least impactful development compared with residential and higher impact commercial development, makes no sense. From a conservation or endangered species protection standpoint, when one could otherwise put a multi-lot subdivision on the land, solar development has many advantages over other development alternatives. With solar you end up with renewable energy, town and landowner revenue, and a meadow environment, not more houses in need of increased town infrastructure, schools, and energy usage. Not to mention the fact that the Natural Heritage Program requires a significant amount of land to be put into permanent conservation. As owner of a large tract of undeveloped land in Mattapoisett, I would continue to work with NHESP on a comprehensive permit that would specify that roughly 75% of the available land go into conservation, with the other 25% being used for solar.

The only grandfathering DOER has proposed would extend to projects with ALL permits in hand by April 15, 2020. What about projects that have spent significant money but are 75-99% through the approval process? If the DOER's rule change is allowed to stand, it will cause the loss of jobs, an estimated \$1.4 million in vital town revenue, and conserved acreage about three times the amount required for the project footprint. Taking away this project's qualification for the SMART program will hurt the town and its residents, remove 7 MW/annually of renewable energy from the State's generation ability and put 100+ acres of land under pressure for more invasive development. Similar losses for multiple towns will have a very detrimental effect on the Commonwealth.

I ask that you please rescind this disqualification of priority habitat and return the requirements to the original rules. I believe the consideration for such action to have been insufficient and not in the best interests of local and state needs.

Thank you for your consideration and action.



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