

June 1, 2020

The Garden Club Federation of Massachusetts was organized in 1927 and currently includes 174 local garden clubs and almost 11,000 members. Our members “pledge to protect and conserve the natural resources of the planet Earth and promise to promote education so we may become caretakers of our air, water, forests, land, and wildlife.” Our organization takes this pledge seriously; we are allied with a number of environmental groups (ie Environmental League of Massachusetts, The Nature Conservancy, and the Native Plant Trust); and we engage in many educational activities to enhance the natural environment (ie our current Native Plant Challenge to encourage members to add native plants to their gardens and communities.)

We are writing today about the SMART Program Emergency Regulation 225 CMR 20.00 and proposed changes. Maria Bartlett testified briefly during the May 22, 2020 Public Hearing....we now wish to add additional comments for your consideration.

Firstly, we applauded the expansion of new solar generating capacity from 1600 MW to 3200 MW. At a time when climate change is accelerating globally with alarming consequences to all forms of life, it is imperative that we add renewable sources for generating electricity.

Secondly, we applaud the additional protections included under the Land Use and Siting Criteria of the Regulations for Priority Habitat, Core Habitat, and Critical Natural Landscapes, plus disallowing solar ground mounted arrays on land if “50% or more of its area is so designated.” Although solar generation is to be supported and encouraged, we do not want it to be at the expense of harming, reducing, or endangering the natural spaces we so need for critical wildlife and plants. It is also true that these types of lands help sequester carbon which will provide critical assistance in meeting net zero goals. The availability of a land use tool by DOER makes it easy for property owners to determine whether their land is eligible.

Finally, we applaud the inclusion of the new Pollinator adder to the Compensation Rate, using the Pollinator-Friendly Certification Program developed by University of Massachusetts to determine eligibility. Adding an additional compensation to those new AND existing projects for adding and maintaining pollinator habitat along with their solar array will help reverse the steady and alarming decline of bees, birds, insects and butterflies over the past 20 years.

Thank you for the opportunity to comment on the proposed Emergency Regulation.

Bonnie Rosenthal, President

Garden Club Federation of Massachusetts

7 Ponybrook Lane

Lexington

973-557-6186

Maria Bartlett, Chair

Environmental Awareness, Garden Club Federation of Massachusetts

26 Jenkins Road

Andover

978-590-0547