

SMART Public Comment

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

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MA DOER Comment,

Protect MA Forests from Large-Scale Solar Development

Why is the DOER hiding behind the Covid-19 Pandemic and enacting emergency regulation? The only emergency is the destruction of Massachusetts forest by the DOER. To date 77% of all subsidized large-scale ground-mounted solar installations have occurred on previously productive farm land or forest habitat. This according to last year's Harvard University study. Current DOER mandates have the solar developers estimating the clearing of an additional 70,000 acres. At the same time a report by the National Renewable Energy Lab estimates that over 40,000 acres of rooftops are suitable for solar development in Massachusetts. The Commonwealth must **prioritize** rooftop solar development and ensure that the forests and farmland MA land trusts have worked so hard to conserve remain unharmed.

Most people support a clean energy system, but few face the reality that solar is NOT the solution. On the DOER website is data on existing solar arrays, they have a "capacity factor" of only 13.35%. This means that they only produce electricity a little more than 3 hours per day. The land is off limits to nature & wildlife 100% of the time. The output from solar is so erratic and unpredictable that the utilities have instituted a moratorium, aptly named "Cluster Study". The electricity that we all depend on needs to be steady, stable and controllable. Solar & wind generation is variable, intermittent and "non-dispatchable" because it is directly tied the forces of mother nature.

During the current pandemic we have all learned that depending on China for the essentials of life is not always good. An electrical grid powered by Chinese sourced solar & wind generators, inverters, batteries, etc will result in giving the control of our electrical system to a foreign power. China controls over 95% of the worlds mining and processing of "Rare

Earth Metal". It is impossible to manufacture a solar panel, a wind turbine or an inverter without having China supply essential components.

Renewable generation needs to be restricted to reducing electrical demand not supplying the "grid". Without natural gas generators compensating for the intermittent nature of renewable energy the grid would crash and Massachusetts would be subjected to the same fate as Australia, rolling blackouts.

I am not totally against solar & wind generation, but the DOER needs to be more transparent about it's true cost & shortcomings. We are encouraged by the state's inclusion of [land-use siting guidelines](#) that will prohibit solar energy development where at least 50 percent of the parcel's land area is designated as Priority Habitat, Core Habitat, or Critical Natural Landscape as identified in BioMap2. This prohibition should remain in the land use siting guidelines.

We urge DOER to revise the SMART program to avoid, or at least significantly reduce, the amount of forests and farmland that is being converted to large-scale ground-mounted solar arrays, and to better align this program with other Commonwealth programs and goals including the Executive Office of Energy and Environmental Affairs Resilient Lands Initiative and implementation of the State Hazard Mitigation and Climate Adaptation Plan (SHMCAP).

The "Greenfield Subtractor," which is the financial disincentive to build on forests and other open space, should be increased to five times its current level and applied to the entire footprint of the project (not just the solar arrays), to further discourage development on such greenfields.

For any greenfield development MassWildlife, the MA DEP and a Massachusetts Endangered Species Act (MESA) review should be brought in early not at the 11th hour.

Solar developments that provide electricity to public entities should be subject to BioMap2 restrictions, designated as Category 2 land, and they should not qualify as Category 1 land.

DOER should add locations on Municipal Vulnerability Program maps to its criteria of land where solar development is prohibited, because these sites are vulnerable to hurricane storm surges and future potential flood areas due to sea-level rise and are habitat migration pathways.

Greater incentives should be provided to encourage the development of solar on rooftops, parking canopies, highway cloverleaves and other distributed areas.

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