

SMART Public Comment

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

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Department of Energy Resources:

On April 15, MA Department of Energy Resources (DOER) released its emergency regulations to the Solar Massachusetts Renewable Target (SMART).

The emergency regulations 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 defined by BioMap2.

While it is encouraging that there is some small recognition of the importance of forests and natural lands, and that there are some limits on solar development of natural areas, this regulation is deficient.

DOER should immediately revise the SMART emergency regulations to avoid transforming critical farmland soils and active agricultural fields into a commercial/industrial use as electric generation. This is particularly true during the present pandemic when locally produced food and commercial goods are essential with supply chains being disrupted.

Furthermore, part of the Commonwealth's plan to meet state and regional carbon goals is tied to the Massachusetts forest cover that reduces pollution from midwestern states and sequesters carbon. The present SMART regulations do nothing to avoid forest from being being converted to large-scale ground-mounted solar arrays.

Instead of converting "greenfields" to solar energy we must focus on converting "grey fields" and "brownfields" to energy production. It is critical to encourage the development of solar on rooftops, parking canopies, highway edges and interchanges, and other distributed areas.

While it means nothing to DOER, please know that to the residents and representatives of Central Massachusetts our farmlands and forest are a critical part of our landscape, our identity, and our economy.

It is necessary to revise the regulations to align the SMART program with Massachusetts' climate and land conservation programs and goals by adding both farmland and forest land to the current list of prohibited landscapes in the development criteria.

Sincerely,

Colin M.J. Novick

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Executive Director

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