

## SMART Public Comment - 2020 May 30

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

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Dear DOER,

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.

Thank you have a nice weekend.

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