

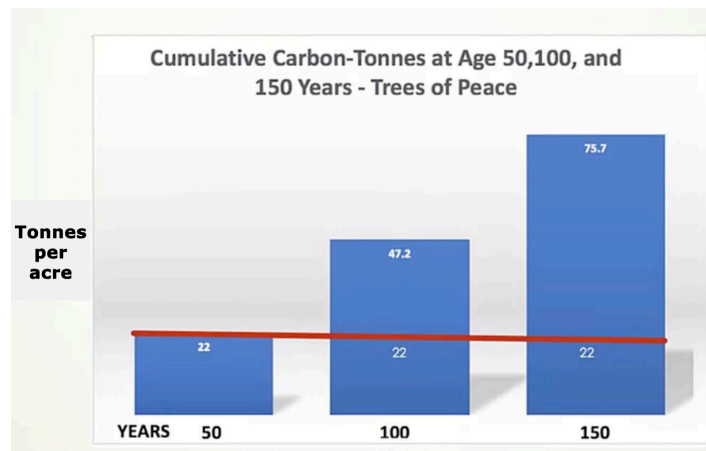
Comments on proposed SMART 3.0 Solar Regulations

To Whom It May Concern,

I am writing to express my concerns regarding the SMART 3.0 solar regulations. While I appreciate the efforts to expand solar energy, several aspects of these regulations raise environmental and economic concerns that I believe need to be addressed to ensure a balanced approach between renewable energy development and environmental conservation.

1. Forest should not be sacrificed for solar projects

I have seen calculations that show that solar panels reduce emissions more than the amount of carbon that a forest stores over a period of thirty years. This argument is shortsighted and dangerous for several reasons. First, it does not account for the fact that a forest would have to start from scratch after a decommissioning, if it can even grow on such degraded land at all. A hundred year old tree, for example, holds more than twice as much carbon as fifty year old tree, and a 150 year old tree holds more than three times the amount of carbon as a 50 year old tree.



This argument also generally does not account for the carbon in the soil that will be released in addition to the plants that are removed, yet soil carbon can account for up to 50% of a forest's carbon storage. Second, although solar energy will help to reduce emissions, it does nothing to sequester and store atmospheric carbon, which is needed in addition to emissions reductions in order to achieve climate goals. Third, it does not account for the complete obliteration of all life forms in a forest, both above and below ground, in the middle of our equally important and intricately climate-related biodiversity crisis. Slowing the biodiversity loss is arguably even more important than lowering greenhouse gas emissions, as it will lead more rapidly to our demise. And finally, after a

project is decommissioned, the land will need to recover (if it can) and start from scratch. So a 50 year-old forest, for example, that would be 80 at the time of decommissioning if it had been left alone, now starts from 0. This represents a huge missed opportunity to capture and store more carbon and to heal the planet.

The restrictions on solar development on forested land as written in the current version are insufficient, particularly when it comes to critical natural landscape areas identified in BioMap3. These areas should be protected and exempt from solar projects unless they are attached to a residence or business.

2. Solar Development on Farmland

The regulations currently permit and even encourage solar installations on productive and prime farmland. This practice may risk a significant loss of crop yields, as the cultivation of crops in or under solar panels can dramatically reduce agricultural productivity. Furthermore, while farmland owners are incentivized to implement this “dual use,” the actual farm is often leased. So while the landowner makes a profit, it is the farmer who suffers the loss. This may also cause a rise in prices. I would encourage more research in this area to account for all the potential outcomes, both intended and unintended.

3. Insufficient Incentives for Built Environment Solar:

Although adders are in place to encourage solar installations in built environments, they are insufficient to significantly deter solar projects on invaluable forest and agricultural land. Furthermore, the adders for rooftop solar do not adequately cover the additional costs associated with these installations, thereby not providing enough incentive to prioritize rooftop solar over large-scale projects. Incentives to develop solar on the built environment must be sufficient to cover the burden of doing so **and** add extra value to the landholder.

4. Vague Mitigation Fees

Mitigation is a slippery slope. Communities and habitats are both highly complex ecosystems which cannot simply be replaced by man-made artifacts. Yet mitigation efforts have the potential to massively fail at truly mitigating the damage caused. Given that there is likely to be some destruction in the process of developing our solar

potential, I believe that practice guidelines should be VERY specific, addressing a variety of potential harms, both to communities and to the environment. The need for mitigation should be minimized to the maximum extent possible, and mitigation fees for environmentally harmful solar developments should be substantial enough to disincentivize such harm.

On a positive note, I commend the improvements made to facilitate the participation of lower-income residents in the SMART program through increased subsidies. This is a crucial step in ensuring equitable access to renewable energy benefits.

In conclusion, while the aim of the SMART 3.0 regulations is admirable, I urge you to reconsider these concerns to foster a more environmentally sound approach to solar energy development. I look forward to seeing revisions that more effectively balance solar expansion with the preservation of our critical land and water.

Thank you for considering my comments.

Sincerely,

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