

65 Lookout Point Road
Plymouth, MA 02360

January 31, 2024

Department of Energy Resources
Solar Massachusetts Renewable Target (SMART) Program
100 Cambridge Street
Boston, MA 02114

Re: Comments on SMART program – Stakeholder Question #13

I am a retired officer of several National Grid companies, head of a local environmental nonprofit, owner of a rooftop PV solar system, former member of the Plymouth Planning Board, and former chair of the Plymouth Water Conservation Committee. I was also formerly a consultant to DOER on electricity markets. As such, my comments reflect a number of perspectives conditioned by real experience.

Please consider the comments below in the process of amending the Solar Massachusetts Renewable Target (SMART) program.

With regard to SMART program conflicts with Massachusetts environmental and land use policies (question 13), I submit the following comments on project siting:

Large-scale deforestation, strip mining, and habitat destruction to make room for solar development is wholly inconsistent with Massachusetts environmental policies, and in certain cases laws and regulations, whose purposes are to combat global warming, protect water supplies, preserve wildlife habitat, and protect threatened and endangered species. Removal of hectares of mature trees unequivocally conflicts with the Commonwealth's climate-change position and policies. Incentivizing renewable energy projects sited in ways that *reduce* natural carbon sequestration and long-term storage makes no sense, especially when alternative sites for solar arrays are readily available.

In many cases, deforestation for solar projects is accompanied by strip mining of sand and gravel, which removes critical filtration above Massachusetts aquifers. Southeastern Massachusetts is replete with such projects, many of which use the guise of renewable energy to pursue entirely separate, commercial profit-making goals. It makes little sense to require septic systems to comply with Title V requirements while allowing solar project developers to strip away large areas of natural, groundwater filtration material.

Loss of trees and increased threat to water supplies are not the only consequences of SMART program provisions. Wildlife habitat is also being needlessly destroyed. In Plymouth, globally rare pine barrens are being impacted without due care to the irreplaceable natural resources they contain.

Eligibility for incentives under the SMART program should be limited to projects that demonstrate *zero impact* on existing natural resources. In particular:

Solar projects eligible for incentive treatment should be placed on buildings and other elevated structures, along roadways and utility rights-of-way, on landfills and brownfield sites, and in other areas where land disturbance has already occurred.

An impact screen and checklist should be added to SMART program qualification to insure that project siting conforms to the zero-natural impact criterion.

Thank you for the opportunity to comment on the SMART program.

Respectfully,

A handwritten signature in black ink, appearing to read "Eric P. Cody", is written over a light gray rectangular background.

Eric P. Cody