



Massachusetts Association of Conservation Commissions

protecting wetlands, open space and biological diversity through education and advocacy

September 27, 2019

Judith Judson, Commissioner
Massachusetts Department of Energy Resources
Executive Office of Energy and Environmental Affairs
100 Cambridge Street
Boston, MA 02114

RE: 400 MW Review Public Comments (Straw Proposal)

Dear Commissioner Judson:

The Massachusetts Association of Conservation Commissions (MACC) is a statewide non-profit 501(c)(3) organization dedicated to protecting wetlands, open space, and biological diversity through education and advocacy. We provide environmental education, training, and assistance to more than 2,000 conservation commissioners throughout Massachusetts. The Commissions protect and preserve wetlands and open space in their communities under the Conservation Commission Act, the state's Wetlands Protection Act (WPA) and local wetland bylaws.

MACC supports renewable energy development to help mitigate impacts of climate change and reduce greenhouse gas emissions. We value the hard work put into the Solar Massachusetts Renewable Target (SMART) Program by the Massachusetts Department of Energy Resources (DOER), and we appreciate the opportunity to provide comments on the 400 MW Straw Proposal.

MACC believes there is not enough of a balance between the environmental controls of the SMART program/Straw Proposal and the economic goals of the program. In particular, we believe the environmental siting controls need to be strengthened to help protect Massachusetts' wetlands, buffer zones, Article 97 lands, forests, and other environmentally-sensitive areas. The follow items outline our comments and suggestions related to the 400 MW Straw Proposal.

- **Environmental Controls are not Adequate in the 400 MW Straw Proposal.**
There have been unintended, negative environmental consequences from the current SMART program implementation. DOER should incorporate additional siting criteria and guidelines to protect forests and other environmentally sensitive areas of the state from rapid solar construction. There needs to be a better balance between economic and environmental aspects of future solar projects.

- **Greenfield Subtractors - Additional Improvements Needed.**

The Adders and Subtractors in the Straw Proposal do not go far enough to correct the imbalance between projects constructed on undeveloped greenfield sites, and building-mounted, brownfield, or carport projects. The proposed increase in Greenfield subtractors in the Straw Proposal is moving in the right direction, but it is not clear these increases will go far enough to improve SMART land use siting. Land use siting requirements should be strengthened during this period of program revisions. In addition, the Building Mounted Adder should be increased to overcome the higher costs associated with siting solar on buildings or on brownfield sites.

- **Data Collection & Analysis Needed Prior to Implementation of 400 MW Straw Proposal.**

Large tracts of forested land have been cleared for solar installations, yet information about the locations and sizes of solar developments in central and western Massachusetts is not available from DOER. Information from outside groups (such as Clark University and Harvard Forest) have prepared recent reports on impacts of solar development in Massachusetts. Prior to moving ahead with the next phase of solar developments, DOER should collect, evaluate, and map information about the installed solar installations (as well as approved, and soon-to-be-built, solar projects). The mapped data could be made available as a GIS layer through OLIVER.

- **Emergency Regulations.**

It is not clear why there is a need for emergency regulations. Consideration of taking “a step back” could allow time for strengthening environmental siting requirements, while providing time for data collection, mapping, and coordination with environmental, municipal, and other stakeholders.

We hope DOER will find the balance between the environmental aspects and the financial focus of the SMART program. Thank you for the opportunity to provide comments on the 400 MW Straw Proposal.

Sincerely,

Massachusetts Association of Conservation Commissions



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