

September 18, 2019

Public Comments on SMART 400 MW Review

To: DOER

From: William Hogan

145 Secret Lake Road

Phillipston, MA 01331

bill31dep@yahoo.com

I am commenting as a concerned citizen. I purchased property on Secret Lake in Athol/Phillipston in late 2018 and shortly thereafter discovered a proposal before the Athol Conservation Commission for two 5 MW solar photovoltaic installations directly across the lake. The immensity of these proposals and their impact on the environment of the area and on the character of the town were sufficient to cause the citizens of Athol to vote for a moratorium on new solar installations until October 2020. The vote was 180-2 for the moratorium and clearly reflected the citizens concern for locating large commercial installations in a rural, residential area far from any service area need.

Here are the facts of these two proposals as they are pertinent to understand the comments on the program to follow. Cypress Creek Renewables from Santa Monica CA proposed both sites. Both sites were owned by one individual and while separate lots, are contiguous to one another. The only difference was the LLCs created. However, all of the authorized agents in the LLCs were employees of Cypress Creek. This is a sham that should not be allowed under the SMART program.

Each system submitted separate applications to the Athol Conservation Commission for a wetlands determination prior to filing any application with the Athol Planning Board. Each system was for 5 MW and the forested land area to be cleared was 46 acres per site with 30 acres of panels each. In addition, the panels from one of the sites were less than 150 feet from the shoreline. The applicant eventually withdrew one of the sites due to too many wetlands and buffer areas dissecting the site. The second site was approved by the Conservation Commission but was stopped from submitting an application to the Planning Board due to the moratorium.

Needless to say, these two proposals got the attention of the citizens of Athol. The environmental impact of clear cutting 92 acres of heavily forested land from approximately 150 acres was never considered by the landowner or Cypress Creek. This includes impacts on wildlife, as well as impacts on Secret Lake from runoff. And all this is in a rural, residential zone where no other commercial operations are allowed!

I have reviewed the SMART Program 400 MW Review document and applaud DOER for some of its proposed changes, but also challenge that some have not gone far enough.

Comments.

1. Page 2 SMART Application Statistics

The fact that there are waiting lists in both EDCs that service western Massachusetts while Eversource East is only on block 3 of 8 is telling in itself that financial incentives need to be changed to influence the location of future proposals. It is profitability alone that drives where the solar companies are looking to construct. That profitability is affected mainly by the compensation rates of the program and the cost of land. The cost of the actual solar installation and related equipment is virtually identical regardless of the region of the State. With National Grid and Eversource West having waiting lists while Eversource East has obligated only 25.5% of its capacity, DOER must ask why and make changes that they control to truly influence the location of new installations in the area of need for power. In addition, there are secondary costs to modify the electrical grid due to the concentration of solar installations in rural areas. While these costs are not borne by the SMART program, they are costs created by the program regulations that can be minimized with revisions.

2. Western Massachusetts, with its rural character, should not bear the responsibility of siting an unbalanced percentage of the installations.

3. DOER cannot regulate the cost of land that is far cheaper in western Massachusetts than the rest of the State. So DOER must focus changes in its Category definitions and its financial incentives, including the base rates as well as adders and subtractors such that solar installations are constructed closer to the population needing to be served and strengthening the grid to serve that population.

- a. Under land use proposal: I fully support deleting the solar zoned from Category 1. However, the subtractor should not be moved just to Category 2 but rather to EITHER Category 2 or 3 dependent upon the zoning category. Residential zoned land should have the largest subtractor.
- b. Increase the proposed greenfield subtractors to 10 times the previous insufficient amount, not just 5 times. The solar proposal near Secret Lake, with 46 acres of clear cutting of forest and 30 acres of panels, would have received a subtractor of only 1.5 cents. What a cheap price to put on 46 acres of forestland. This is also on the largest sized installation allowed under the SMART program. If it were only 10 acres of panels, the subtractor would be only 0.5 cents. This amount is not a deterrent to the solar developer, more like a nuisance. It would not sway the decision to build or not. . The subtractors need to be similar in magnitude as the adders such as 3 cents for a brownfield, or 4 cents for a landfill.
- c. The greenfield subtractor should also be calculated on the total forest area cleared, not just the area of the solar panels.
- d. I agree with eliminating the rate of decline for location-based adders.
- e. I agree with increasing the public off-taker adder.

f. I strongly support the development of a new preferred interconnection adder/subtractor. This would recognize the non-SMART program costs of constructing installations where there exist grid limitations. They must be of sufficient magnitude to influence the location of the installation.

g. I agree with the concept of a pollinator adder, however, it is weighted the same as the subtractor for the use of greenfields. The cumulative environmental impacts of the use of greenfields are far greater than the benefit of pollinators. This is just an example that the weighting of the greenfields subtractor should be increased.

I thank you for this opportunity to comment on the program. I hope that DOER will revise the program regulations such that it truly influences where the solar installations are located. And I hope the DOER listens to citizens comments to the same degree as industry comments.