

Barnicle, Abby (ENE)

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Sent: Friday, September 25, 2020 3:55 PM
To: DOER SMART (ENE)
Subject: SMART ASTGU Guideline Comments

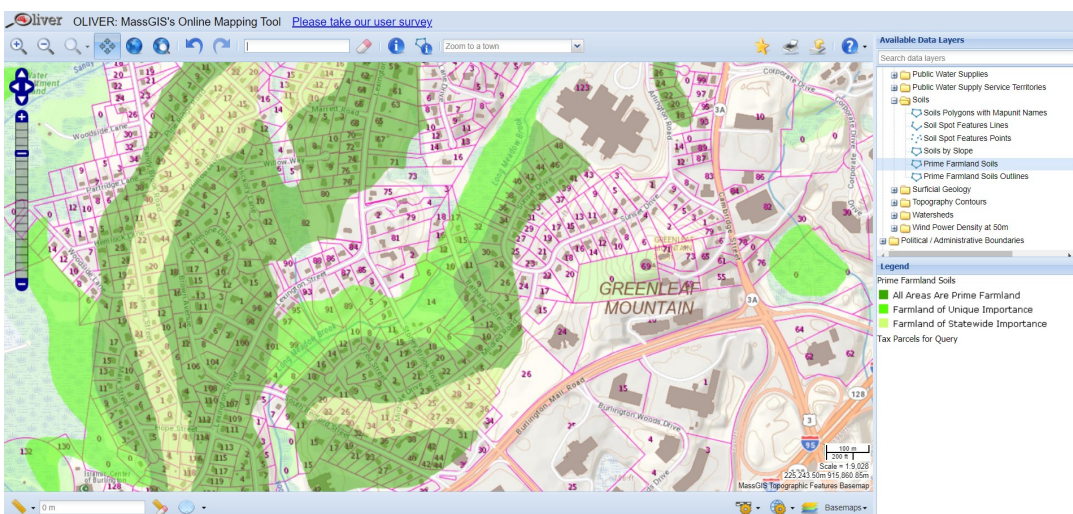
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Good Afternoon,

See below comments to the [straw proposal](#) for the guideline of SMART ASTGU:

- In regards to the information contained on the slide with title "Project Size - Proposing New Requirements," I'd like to provide comments on the usability of the "Prime Farmland Layers" found on Oliver MassGIS. This layer shows Prime farmland, unique farmland and additional land of statewide importance. However, as described on the website titled "[MassGIS Data: NRCS SSURGO-Certified Soils](#)" the **"data for each of the 13 soil surveys was acquired and compiled over various time periods. Since then, development of important farmland soils has occurred in some areas and that land is no longer available for agriculture."** This uncertainty presents issues when qualifying sites for Land Use. Given the inaccurate and outdated layer, I would recommend resorting to more tangible analysis, such as soil composition that is suitable for farming. Or simply relying on the other existing requirement, which states "Land defined under 61A or has been enrolled in 61A in the past five years." Please re-evaluate the use of the Oliver MassGIS layer for qualifying Land Use Categories under SMART. See example below. Thank you for the consideration.

* Oliver MassGIS Prime Farmland Soils Layer: this screenshot from the Town of Burlington clearly shows the Important Farmland layers spreading through a significant portion of land that is no longer available for agriculture.



Best,
Lucas
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