

## "SMART Public Comment"

Joyce Eichacker <jeichacker.warrenconcom@gmail.com>

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To: SMART, DOER (ENE) <doer.smart@mass.gov>

Cc: Gobi, Anne (SEN) <anne.gobi@masenate.gov>; Smola, Todd - Rep. (HOU) <todd.smola@mahouse.gov>; Daniel Bigda <dan@boxxcarco.com>; Demetrius Richard <rdemetrius.warrenconcom@gmail.com>

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DOER Smart Program

I am the Chair of the Town of Warren's Conservation Commission and have over 7 years experience reviewing and permitting large scale solar facilities. Warren's inexpensive real estate, large swaths of forested/undeveloped land, upgraded substations (with a new one in the works), and volunteer boards make Warren attractive to Solar Developers. The town currently has 9 facilities built, 3 additional sites permitted and two in the permitting process.

Once all are built, Warren will have lost **over 500 acres of forest and approximately 100 acres of farm land for ~55MW of solar energy production.**

*The existing 9 facilities* in Warren already have the capacity to produce 10-fold the energy than the town can consume. Neighboring towns are in the same situation, to a lesser degree – they won't need the energy produced in Warren - so about 5 MW will remain, and ~40 MW of energy will be transported to where it is needed most – *urban/populated areas*. For all this to work, upgrades will be required, resulting in additional destruction of green space.

Warren is a textbook example of what needs to be changed in the next round of the SMART program, and why modifications are desperately needed.

Solar development in rural communities is a **social justice** as well as an **environmental issue**. We in rural Massachusetts are carrying the brunt of this solar load because it's a win-win for all but the host towns.

Key Change Requests:

- Prioritize land conservation over solar development!!
  - Incentives should encourage development in degraded areas anywhere in the state, but in particular, more development in URBAN/Suburban areas with large populations that can actually consume the energy generated. These incentives would include rooftop development, parking canopies, highway cloverleaves, and other distributed or previously disturbed areas. The 106.694 MC capacity blocks available to the Boston/128/495 region vs the 90.466 MW seems to encourage this – but if utility scale solar is less developed within the 495 loop, the blocks for rural should be eliminated or shrink considerable to send a message about where the next phase of development should be focused.
  - DISINCENTIVES/subtractors should be created to dissuade developers from using "SMART" incentives as a means to maximize profits, developing utility scale projects only to be used to obtain green energy credits. This is what has taken place over the past 7 years – cheap land and access to SMART money sent solar developers to rural areas where it not only is easier to build and get a permit, it (was) easier to implement poor construction practices and bully inexperienced volunteer boards. Rural Massachusetts has lost a great deal of land, the abutters real estate values have decreased, environmental infractions have multiplied across the central and western regions because of poor construction sequence stormwater practices, and while these towns get run over, the solar developers take the money and run with their green energy credits.
  - The "Greenfield Subtractor," the financial disincentive to build on forest and other open space, should be increased **to a minimum** of five times its current level **and applied to the entire footprint of the project (not just the solar arrays)**, to further discourage development

on forest and farmland. Replacing carbon sequestering plants with short lived (20 year) “green” solar facility - which includes the access road (often very long) and deforested areas around the facility to allow sunlight to hit the panels is counterproductive.

- The “Greenfield Subtractor” should make development on forest land as – or more - expensive than developing on disturbed areas and parking lots, in particular, inside the 495 (and even the 128) loop. We need to preserve green space – and encourage development of solar where development already exists.
- Solar developments should be **prohibited** — from siting projects in Wetland Resource areas **AND buffer zones** – period. The local conservation commissions should not be asked to permit any project within resource areas.
- There also should be no category 1 exception for Solar projects being sited in Priority Habitat, Core Habitat or Critical Natural Landscape as identified in BioMap2. It is counter-productive to gain green energy credits by destroying green resources. We are only hurting ourselves by allowing work in these resource areas.
- Solar developments that provide electricity to public entities should be subject to BioMap2 restrictions, designated as Category 2 land, and they should not qualify as Category 1 land.
- DOER should add locations on Municipal Vulnerability Program maps to its criteria of land where solar development is prohibited, because these sites are vulnerable to hurricane storm surges and future potential flood areas due to sea-level rise and are habitat migration pathways.

· **Energy Storage Units:** In theory, it makes a great deal of sense to add battery storage to STGU’s. **However**, this technology is still in its infancy as we seek to encourage (through generous attractors!) their installation. The safety of these units is still unknown. Despite best practices, battery facility explosions occurred in Arizona and California last year – and they are still searching for the cause. A few things were learned by forensic scientists that were not previously understood/anticipated: the release of gasses - resulting in required changes to safety features. An explosion could be devastating to a town, to its’ people and to livestock that cannot transported to safety. There are multiple variables to consider and TOO many UNKNOWNs to allow battery storage on sites, near homes and livestock. It is not worth the risk. I am requesting that **DOER REMOVE THE ATTRACTOR FOR ENERGY STORAGE, or even more extreme, prohibit or create a detractor for it** until it is better understood! Remote areas (in the desert, MILES from humanity) is the **ONLY** place **battery storage should be allowed until the kinks are worked out**. We do not care to be human guinea pigs.

· **FLOATING STGU:** If the body of water is connected in any way to resource area (River, lake, wetland, pond, RESERVOIR), Floating STGU should NOT be allowed. Toxic components still exist in solar panels – any leaching would be disastrous. This should be clarified.

· DOER should incentivize solar developers to create **cash decommissioning bonds** for each project –or any other measure designed to ensure the facility is seen through to the end - and that towns are not stuck holding the bag. REGULATION from the STATE should require this as well. Currently ~ \$1M would be needed just to ship the 40K panels from a 5mw site. This doesn’t include panel removal, site work, toxic waste fees. It could cost over \$3M to decommission a 5MW site. Solar facilities are sold multiple times after the initial development, each time the profits decrease. Who will be willing to pay to remove panels at the end of a project’s life vs file for bankruptcy?

· Regulations and incentives should be built into the SMART program to encourage planning for proper disposal of panels. The state currently has NO plan in place – and we are just a few years away from the decommissioning date of the first solar projects.

Joyce Eichacker

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Mail - SMART, DOER (ENE) - Outlook

Chair, Warren Conservation Commission  
413-436-5701 x102