

## Maddalena, Lesley (ENE)

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**From:** Alan Noguee <anogee@gmail.com>  
**Sent:** Friday, February 2, 2024 4:51 PM  
**To:** DOER SMART (ENE)  
**Cc:** Cbrown@seadvantage; michelman@seadvantage.com  
**Subject:** SMART review comments

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Thank you for this opportunity to comment on potential amendments to the SMART program..

My name is Alan Noguee. I am a mostly retired clean energy consultant, having previously spent 17 years with the Union of Concerned Scientists, almost all of them as the Clean Energy Program Director, managing a team of analysts, advocates, and organizers promoting cost-effective scale-up of renewable electricity for customers. My retirement passion is promoting biodiversity, and I am active with the Newton Community Pollinator Project, the Mystic-Charles Pollinator Pathway Group, and the Massachusetts Pollinator Network, and I am the founder and President of the Friends of Cold Spring Park in Newton, MA.

I submit these comments on my own behalf, therefore, as someone who both appreciates both the need for rapid, cost-effective renewable energy development and protecting biodiversity from land uses that destroy or degrade wildlife habitat.

The United Nations has recognized that biodiversity loss presents an existential crisis along with climate change, and Governor Healy recently enacted an Executive Order to promote biodiversity. To be consistent with both climate and biodiversity goals, the SMART program should more heavily prioritize and incentivize the siting of solar facilities in a way that minimizes land use and biodiversity impacts, especially on buildings first, over parking (or road) or other developed surfaces next. While the program prohibits siting on especially sensitive and ecologically valuable lands, to the extent it permits siting on open space, it should incentivize dual- and multi-use sites. As noted in the recent Mass Audubon report, agrivoltaics appears to show considerable benefits in drier regions, but the verdict is still out on the effectiveness of agrivoltaics in the northeast.

I am unaware of any reasons why pollinator-friendly solar should be less effective in the northeast than in other regions. Mass Wildlife and other agencies have programs for increasing pollinator habitat. But before the DPU denied cost-recovery for the pollinator adder, the adder had led to commitments to more than four times as much planted habitat as all other Commonwealth programs combined. And because it required strict certification requirements, it created very high quality habitat with county-level native plants, a set-aside for pollen specialists, and strict management plans.

In the most recent climate law, the General Assembly adopted a provision specifically designed to reinstate the program. Promoting pollinator habitat should be a high priority of revised SMART regulations. While pollinators are in decline from land use changes, pesticides, diseases and climate change, approximately 85 percent of plants in our ecosystem depend on animals to pollinate them. Pollinator diversity and abundance are keystones to healthy ecosystems and agricultural productivity.

One idea, in addition to or as an alternative to reinstating the adder and persuading the DPU to allow cost recovery, might be to consider a feebate that levies fees on projects that have negative land-use and biodiversity impacts that provide incentives to projects that are sited with preferred land-uses. They could thus provide added incentives for

siting on buildings or hardscapes, with a lower incentive for pollinator-friendly certification, and a still lower one for agrivoltatics.

Because forests provide very important climate, ecosystem services and biodiversity benefits, I am sympathetic with activists who would prohibit any solar facilities that require clear-cutting, at least at this point. To the extent that taking trees is allowed at all, however, one possibility for structuring such a feebate would be to look toward various municipal tree ordinances that require mitigation or payment toward mitigation funds for removing trees from public and/or private lands. Somerville, Cambridge, Newton and most recently Boston, are four such communities. Solar developers that remove trees, especially native trees, could be required to replace them per caliper-inch removed on another site, or to pay into a mitigation fund to provide incentives for pollinator-friendly certification or other preferred land-uses.

Another approach that could be considered is having two levels of pollinator-friendly certification. All projects could be required to meet a minimum level, while incentives are provided for a higher level certification. A similar structure has long been used for promoting energy efficiency. I believe that Minnesota has de facto minimum pollinator-friendly requirements for solar facilities in that state.

As I became aware of this comments opportunity only very recently, I apologize for not having more specific recommendations. Colleagues and I would be happy to discuss these or other means to maximize the twin objectives of promoting solar energy and biodiversity. Thank you for your consideration.

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