

## Maddalena, Lesley (ENE)

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**From:** Jodi Rodar <hooppole@gmail.com>  
**Sent:** Monday, January 29, 2024 11:21 AM  
**To:** DOER SMART (ENE)  
**Cc:** CBrown@seaadvantage.com; tmichelman@seadvantage.com  
**Subject:** SMART Regulation Changes

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To Whom It May Concern;

I am writing to comment on the SMART regulations - the framework for solar subsidies in Mass. and the cause of much forest destruction and ecosystem intrusion.

I believe there is a great need to change the incentives - away from building on land that offers resiliency and carbon storage/sequestration to building on disturbed land and the built environment.

The following is how I think the state's solar subsidy should work.

### Adders and Subtractors, Siting Eligibility

The SMART regs incentivize by having "Adders" that add an additional amount to the subsidized rate provided by DOER. They disincentivize through "Subtractors." One problem now is that if developers build in the "wrong" places and get Subtractors, they can compensate by designing to get Adders.

- Incentives (Adders) should be for solar development on disturbed land and the built environment. - only
- There should be NO Adders for battery storage.
- There should be NO Adders for claiming the energy generated benefits low-income communities. This legitimate financial support should be provided by DOER in a direct and more accountable manner. This Adder is an easy way to compensate for siting-related Subtractors.
- There should be NO "Public Entity" status allowed. This is a loophole for developers to get better rates, jump to the front of the line, and avoid local permits before getting their subsidy.
- There should be NO adder for so-called "Dual Use" solar on agricultural land; *it is not proven effective.*
- There should be NO adder for Community Solar; Mass Audubon identifies this as a loophole that creates opportunities for development through destroying forests.
- Building on environmentally designated land, BioMap, should be prohibited without exception in order to align with State priorities to preserve forested land.

- The exception for "good cause," which would allow solar development in forests or agricultural land, should be removed.
- Incentivize small solar - less than 25kw

#### Transparency and community engagement

- Meaningful and documented community engagement and municipal approval must be required in all cases before a subsidy is granted.
- Access to SMART applications should be available to the public in a timely manner via a DOER website.
- Transparency regarding solar applications should be required

#### Safety

- Solar developments with lithium-ion batteries should be prohibited or only allowed with stringent protections based on base practices for fires and water/air contamination.
- The regulations should include clear and measurable public health, welfare, and safety protections - these do not currently exist in the regs.
- Performance standards for solar developments need to be established in the regs based on science and best practices for safety and effectiveness.

Thank you for your time regarding this critical issue.

Sincerely,

Dr. Jodi Rodar