

Maddalena, Lesley (ENE)

From: Annie Hayes <hayesannie@gmail.com>
Sent: Friday, February 2, 2024 4:42 PM
To: DOER SMART (ENE)
Cc: CBrown@seadvantage.com; tmichelman@seadvantage.com
Subject: Fwd: ACTION REMINDER: Comments on SMART Regs Due Fri. Feb. 2

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I concur with these comments of Michael DiChiara. Our forests are being destroyed without the use of degraded lands and innovative placement because of these incentives. The developers don't bat an I in refusing to address and answer the effect of panel coatings and constituent materials to our water caused by years of untested leaching. When evidence supports the forest they have ripped out along with all the wondrous flora and fauna are the best and most efficient and planet sustaining water and air filter we could ever have. it's Madness. Annie Hayes West Wareham Mass. 774-454-7541

From: **Annie Hayes** <hayesannie@gmail.com>
Date: Fri, Feb 2, 2024 at 4:28 PM
Subject: Comments on SMART Regs Due Fri. Feb. 2

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ISSUES TO ADDRESS

There are many things wrong with the SMART regs and they are complex. If you have something in particular, write about that. If not, pick from the points below that move you.

Adders and Subtractions, Siting Eligibility

The SMART regs incentivize by having "Adders" that add additional amount to the subsidized rate provided by DOER. They disincentivize through "Subtractions". One problem now is that if a developer builds in the "wrong" places and gets Subtractions, 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 to be effective.
- There should be NO adder for Community Solar; Mass Audubon identifies this as a loophole that creates opportunities for development on 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 prior to a subsidy being 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 either 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

INSTRUCTIONS

- **Email to:** Send to DOER.SMART@mass.gov with CC: to CBrown@SEAdvantage.com and tmichelman@seadvantage.com
- **Subject Line:** "SMART Review Comments"
- **Deadline:** Feb. 2 at 5pm

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Michael DeChiara
mdechiera@gmail.com

Preferred pronoun: he/him/his ([why include this?](#) -- [about pronouns](#))

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