

## Maddalena, Lesley (ENE)

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**From:** Thomas Matsuda <matsudat13@gmail.com>  
**Sent:** Saturday, January 27, 2024 8:24 PM  
**To:** DOER SMART (ENE)  
**Cc:** CBrown@seadvantage.com; tmichelman@seadvantage.com  
**Subject:** SMART Review Comments

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**Question 1. The SMART program currently provides added incentives for certain project types, including building mounted, canopy mounted, landfill, brownfield, agricultural, floating, community solar, and projects serving low income or public entities, projects with energy storage, and axis racking. DOER seeks additional feedback on changes or improvements that will advance achievement of the Commonwealth's 2050 GWSA mandates while balancing land use, equity, and economic considerations.**

- a. **What project type incentive changes could improve program outcomes?**
- b. **Should other project types also be prioritized?**

Despite the stated incentives, there are loopholes in the SMART project eligibility that result in preferred project types - building mounted, canopy mounted, landfill, brownfield development - not being incentivized or adequately built. This needs to change.

**Question 9. Are there examples of dual use agrivoltaics policies in other jurisdictions that align with Massachusetts' solar and agricultural objectives? Please provide citations and summaries of those policies.**

Dual use agrivoltaics are not proven to work and should not be incentivized. If allowed, they should only be allowed in limited instances for grazing. It would be better to collect data through small-scale pilot before allowing full implementation and subsidies for agricultural deployment.

**Question 13. Are there any Commonwealth policies (e.g., renewable energy goals, land use priorities, housing policy) that you believe the SMART program inadvertently conflicts with? Please describe any potential modifications to SMART that would alleviate these conflicts.**

SMART regs currently do not align with existing policy documents and reports. These are:

The Massachusetts Clean Energy and Climate Plan for 2050. "Climate-intensified ecological disturbances, the conversion of forests to other land uses, and a slowdown in the growth of Massachusetts' aging forests present considerable risks and challenges to maintaining current levels of carbon sequestration through 2050"

The BioMap program. By MassWildlife and The Nature Conservancy. This needs further protection from SMART projects. While current regulations seem like they protect BioMap land, in practice, this does not happen because of the loopholes created by the SMART project eligibility.

**Question 14. Is there any additional feedback you wish to provide to DOER?**

There needs to be explicit environmental protections to prevent contamination of drinking water/water supply from risk of contamination from lithium-ion energy storage systems (ESS) and the use of PFAS on solar arrays.

There needs to be requirement for community comment before SMART Statement of Qualification is approved for the subsidy

Respectfully,  
Thomas Matsuda  
93 Cave Hill Rd.  
Leverett, MA 01054