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Via electronic submission:

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## Comments of Berkshire Environmental Action Team on the Massachusetts Department of Energy Resources' SMART Programmatic Review

Please accept the following comments from No Fracked Gas in Mass and Berkshire Environmental Action Team (BEAT). BEAT works to protect the environment for wildlife in support of the natural world that sustains us all. No Fracked Gas in Mass works to stop the expansion of fossil fuel infrastructure in the Northeast states and to promote energy efficiency and sustainable, renewable sources of energy and local, permanent jobs in a clean energy economy.

After review of the proposal, we'd like to offer the following changes:

### SITING, INCENTIVIZATION AND ADDERS

- To prevent the taking of forested and environmentally sensitive land, adders must only be allowed for solar development on disturbed land and the built environment. Solar development on lands designated as environmentally sensitive, and their surrounding buffer zones, must be **prohibited without exception**.

- Adders for solar development on agricultural land must only be allowed for "agrivoltaic" projects made in development with farmers on actively used land. It should not be allowed for projects built on viable but currently undeveloped farmland as a speculative development.

- The "good cause" exception must be removed.

- Adders for projects where energy generated benefits low-income communities should only be allowed for truly **community-owned projects**, where members of the low-income and environmental justice communities are direct and sole owners of the project. Development of truly community-owned solar projects will allow for direct democratic control and true opportunity for wealth-building. Adders for non-community based developers who provide marginal benefit for low income communities are of limited value and should be in a separate class from community-owned solar projects.

- Adders for battery storage should only be allowed if the proposed storage facilities meet strict safety standards and local approval after a public hearing process. DOER should establish safety

standards (setbacks, fire prevention measures, soil and groundwater protections in case of catastrophic failure, etc.) for different types of storage facilities, appropriate to risks inherent in each type of storage system, as lithium-ion, iron-air and other types of battery systems have **inherently different risk profiles**.

- Solar projects smaller than 25 kW need to be incentivized. This creates the opportunity for rooftop and parking lot development on municipal and small businesses premises and will allow for greater distribution of solar development.

## **COMMUNITY ENGAGEMENT**

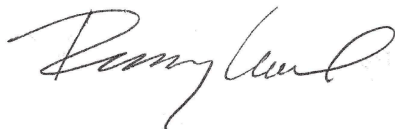
- **SMART applications should be available to the public** via any applicable regulatory agency where they are filed, with cross-links between different agencies for each project. All permitting including solar project siting, interconnection, rates cases, SMART application, etc., for any one project should be made available by DOER in one location, so a single project can be followed through the entire approval process.

- **Outreach to community members**, whether designated environmental justice or not, should be undertaken. Decisions made on energy projects affect us all. This should include public hearings IN THE TOWNS where the project is to be located, outreach to LOCAL public media (not just notices in Boston newspapers), and outreach to town officials and to local grassroots organizations. Individual agencies within the Executive Office of Energy and Environmental Affairs (EEA) have been actively engaging outreach to Environmental Justice communities. The Department of Environmental Protection, especially its Western offices, have adopted very inclusive notification practices. All departments under EEA jurisdiction should be making the same efforts.

Respectfully submitted,



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Cc:

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Climate Chief Melissa Hoffer