

Maddalena, Lesley (ENE)

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To: DOER SMART (ENE)
Cc: CBrown@SEAdvantage.com; tmichelman@seadvantage.com
Subject: SMART Review Comments
Attachments: SMART Stakeholder Questions 2024.pdf

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SMART Stakeholder Feedback 2024

Respectfully submitted by
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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?*

Currently, solar is largely being built in forested and farmed sites. The incentives are not adequate to steer development away from farms and forests.

According to the Northeast Wilderness Trust, mature forests(80 years or older) sequester between 53.9 and 76.4 tons of carbon above ground – and about the same amount in roots and soil. <https://newildernesstrust.org/wp-content/uploads/2023/10/Wild-Carbon-About-Page.pdf> We cannot sacrifice intact mature forests that provide a multitude of ecosystem services for solar development.

Use the Massachusetts Technical Potential for Solar Study for siting criteria <https://www.mass.gov/info-details/technical-potential-of-solar-study>

Remove loopholes that allow bad siting if the entity claims Low-Income or Public Entity status, or is exempt because of Community Solar structure.

Increase the adders for construction on brownfields, parking lots, landfills and public rights-of-way. Increase the subtractors for removal of mature trees – clearcutting is not adequately disincentivized.

Increase funding for pilot projects to optimize crop production and solar. Dual-use done well can help keep farmers in business. Incentives cannot allow farmland to be non-productive.

https://ag.umass.edu/sites/ag.umass.edu/files/pdf%2Cdoc%2Cppt/crop_yield_comparisons_2016_-_2017_umass_farm_nrel_co-location_project.pdf

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.

One large-scale agrivoltaics success story is Jack’s Solar Garden in Longmont,

CO. <https://www.jackssolargarden.com/the-vision> Fundusol <https://fundusol.com/index.html> is a company that works with farms to optimize crops and solar – they recently won a grant from the National Renewable Energy Laboratory <https://www.nrel.gov/news/program/2024/solar-prize-round-7-semifinalists-bring-bold-bright-ideas-to-competition.html>

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 Technical Potential of Solar Report documents that there is 15-18 times the available land for the Commonwealth to meet its climate goals and creates a system based on suitability for where siting of solar should occur.
 - “Because of the amount of suitable solar potential identified, we can be aggressive with our solar policy while balancing land use priorities and protecting our natural resources.”
- The Massachusetts Clean Energy and Climate Plan for 2025 and 2030. Identifies that “Natural and working lands’ ability to sequester emissions will be a critical component of achieving net zero GHG emissions in Massachusetts”.
 - “To retain NWL [Natural Working Lands] carbon sequestration capacity for 2050 and prevent further emissions, the Commonwealth is committing, through state conservation efforts, to the goal of increasing permanent conservation of undeveloped land and water (including wetlands) in Massachusetts to at least 28% and 30% by 2025 and 2030, respectively.”
- 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. These areas need 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.

To eliminate conflicts with farmland and prime habitat, remove eligibility loopholes.

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

- Design an adder that makes rooftop-solar attractive to industrial and commercial buildings – factories and large stores. The flat, steel roofs are ideal sites for large-scale solar. Prohibit removal of topsoil from ground-mounted sites – many industrial scale installations have resulted in catastrophic erosion and mudslides.

Require native pollinator plantings instead of a mowing regimen – this supports pollinators while avoiding emissions and soil compaction of regular mowing.

Establish criteria to prevent contamination of drinking water/water supply from risk of contamination from lithium-ion energy storage systems.

Prohibit the use of PFAS on solar arrays.

Mandate community comment before SMART Statement of Qualification is approved for the subsidy

All SMART applications and associated documentation should be publicly available on a DOER website; posted in a timely manner to allow for community engagement.

Limit on solar development size should remain at 5MW