

Dept of Energy Resources
100 Cambridge Street, 9th Floor
Boston, MA 02114

Re: Comment on SMART stakeholder questions

Please accept the following comments regarding revisions to the SMART program regulations. Kingston has been on the leading edge of permitting bog solar projects, though utility company hookup delays have stretched out implementation timelines. For any followup, please email me at mpenella@kingstonma.gov.

1.
 - a. Program outcomes will be improved by COMPLETE disincentivization of deforestation and use of sites with quality farm soils (where soils would be impacted). It makes zero sense to reach renewables goals by taking actions detrimental to climate resiliency and food security. Developers are using subsidies to force these projects into areas detrimental to surrounding communities. Ending the subsidies ends much of the financial incentive. Adding incentive to projects in previously disturbed areas may take some of the pressure off of the forests and farms.
 - b. Maybe prioritize inventive/cutting-edge projects that have potential to revolutionize renewable energy in the region. Thinking geothermal, tidal, etc., maybe even carbon capture. Some studies suggest solar and wind will not be enough...
2. No comment
3. No comment
4. Hard to say, COVID was an issue for sure, along with unpredictable supply chain issues. Eversource seems to have long timelines for allowing grid connections, and the projects can't break ground without that approval. This has led to at least one local project accidentally letting their wetlands permit expire, needing to re-file at great time and cost, in addition to renewing interactions with abutters.
5. Unsure- see 1b
6. No comment

7. Would be a good idea to have an easily-reached SMART representative available for municipalities to reach out to during permit review. Could help answer questions, ease concerns. These projects are often complex, and the technology is in its infancy, particularly the dual use cranberry bog projects where the arrays will be interfaced with the groundwater table, and local aquifers. People have a lot of questions. In Kingston we required downstream water testing in advance of construction and annually thereafter, with conditions that the developer/owner would need to analyze any results that exceed EPA drinking water standards, and fix any issues that are identified. More studies/info to support the narrative that “panels are just sand” or comparing potential issues with support structure materials would help soothe fears.
8. No comment
9. No comment
10. No comment
11. Is there a way for the program to incentivize local production of materials?
That alone would help, as global policies and supply issues are hard to control. Has the benefit of boosting local economies. If hookup wait times could be figured out, aligning projects to allow for bulk purchasing may save money, limiting exposure to price fluctuations.
12. No comment
13. I’ll reiterate that SMART and any other state solar programs should completely disincentivize projects that clearcut forest, disturb quality habitat, or impact farm soils. These actions (in addition to allowing 40b projects to bypass local wetlands regulations) conflict with the state’s climate goals and responsibility towards protecting quality habitats and biodiversity.
14. Look into what’s happening in southeastern MA- cranberry country. Solar projects being sited (often in Priority Habitat for rare species or within important wetland buffers or potentially sensitive archaeological areas) for maximum yield of sand and/or other aggregates. Sand mining is not allowable in these areas except as where necessary and incidental to a permissible end use, and the state’s solar regs appear to be the Trojan horse allowing massive sand extraction projects that threaten not only biodiversity and quality of life for surrounding residents, but the safety of the Plymouth-Carver Sole-Source Aquifer. Are these projects making use of SMART? Are the existing land use criteria strong enough to prevent massive deforestation in SEMA in the name of solar power for climate protection? Because that’s what appears to be

happening, and it's not to the benefit of the people of the Commonwealth,
only for the pockets of a few.

Thank you for your time! Best,



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