



Town of Nantucket

Planning and Land Use Services

Building ▪ Energy ▪ Historic District Commission ▪ Planning Board ▪ Zoning Board of Appeals

Director, Renewable Energy Division
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

October 13, 2021

Re: SMART Guideline Comments Re: Land Use, Siting and Project Segmentation

Dear Mr. Steltzer:

Please accept the following comments from the Town of Nantucket, representing the constituent rate payers of Nantucket Electric d/b/a National Grid, regarding the revised *Guideline Regarding Land Use, Siting, and Project Segmentation*.

The Town respectfully requests for the DOER to recognize that [7 C.F.R. § 657.5\(a\)](#) evaluates only the physical characteristics of soils in making Prime/Unique/Important Farmland soils designations, and does not consider other restrictions which may inherently prevent or preclude agricultural activity at a site—especially at those that are municipally-owned and controlled. Examples of sites that may have the physical characteristics of Prime soil under [7 C.F.R. § 657.5\(a\)](#) but where other restrictions prevent or preclude agricultural activity include uncapped landfills, unpaved areas of (high-security) airport property, and Public Water Supplier properties within MassDEP Zone 1/Zone 2 designations. We suggest the following amendments, highlighted in blue, to the revised guidelines to help facilitate the consideration of these types of projects:

Alternatively, an applicant may request a determination from the Department whether a site is in Important Agricultural Farmland and is available for agricultural use, pursuant to 7 C.F.R. § 657.5(a). The applicant must demonstrate to the Department's satisfaction that the site contains: (1) impervious surfaces; (2) is located in an urban area; or (3) is otherwise unable or unsuitable to be used for agriculture due to local, state or federal restrictions placed on the site. The Department may consult with state and federal agencies including the Natural Resources Conservation Service (NRCS) and Massachusetts Department of Agricultural Resources (MDAR). The request should include a site plan depicting where the STGU's footprint overlaps with the Important Agricultural Farmland, the impervious surface, or urban area on the parcel.

We thank the Department of Energy Resources for their work on revising the SMART regulations and are hopeful that the proposed revisions to the current program will further sustain the growth of clean, locally-generated energy for the Town and County of Nantucket.

Sincerely,

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