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--- submitted electronically via [doer.smart@mass.gov](mailto:doer.smart@mass.gov)

To: Department of Energy Resources

Re: Comments on 400MW review proposed changes to SMART program

Date: September 26, 2019

From: Adele Franks, Climate Action Now, Western Mass

I am writing on behalf of Climate Action Now, Western Mass to urge changes to the SMART program, beyond those put forth in the recent straw proposal for public comment. We are strongly in support of strengthening the SMART program to incentivize more solar development in Mass, to help us achieve a transition to 100% renewable energy by 2050.

Here in Western Mass we are seeing many acres of farmland and forest replaced with solar fields, and know that is unsustainable.

We recommend that the SMART program be modified in the following ways:

1. Dramatically increased incentives for solar installations are necessary to encourage solar canopies on parking lots, brownfields, and other already developed land. We have hundreds of acres of parking lots where solar canopies would provide welcome shade, without disturbing our green spaces.
2. State-wide solar siting criteria should be created to protect core habitat of rare/endangered species as well as our forests and wetlands. Individual municipalities should not be left to fend for themselves. Model solar bylaws should be offered through the Green Communities program such that our natural resources can be protected, and any greenfield solar development could not be exempted from the greenfield subtractor. In fact, the municipal bylaw exemption should be eliminated entirely.

It is crucial to provide an updated model solar municipal bylaw at the state level, so that small rural communities do not need to shoulder the burden of trying to figure this out on their own, with their limited resources. The development of a model municipal bylaw should be a high priority and should engage regional planning agencies as well as municipal planning boards as part of the development process.

3. Long-term planning for a sustainable expansion of solar statewide should become the norm, rather than the hurried type of review currently underway. In order to support our solar industry, we need a long-term strategy with policies that are stable and can be relied upon by our solar companies. The frequent changes in policy as currently practiced, lead to instability in our solar industry and loss of jobs.

A permanent Solar Advisory group should be established to help guide long-term planning, and should include, at a minimum, solar industry representatives, environmental organizations, agricultural representatives, regional planners and municipal organizations such as the MMA.

4. There should be maps and other modes of information available to the public showing where solar is being developed, how the land was used prior to solar development, and how much forest is being removed in the process.

5. There should be set-asides for medium sized arrays 25-500kW so that large developers cannot scoop up all the capacity and shut out smaller commercial/municipal customers.

6. Any applications accepted after the new program is announced should be subject to the new provisions and incentives, so that developers cannot game the system and rush their proposals in before the new provisions take effect.