



The Trustees of Reservations
200 High Street | Boston, MA 02110

June 1, 2020

Email: DOER.SMART@mass.gov

Patrick Woodcock, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street
Boston, MA 02114

Re: SMART Program Emergency Regulations Comments

Dear Commissioner Woodcock,

Thank you for the opportunity to submit comments on the Solar Massachusetts Renewable Target (SMART) Program Emergency Regulations promulgated by the Department of Energy Resources (DOER).

The Trustees preserves, for public use and enjoyment, properties of exceptional scenic, historic, and ecological value in Massachusetts, receiving over 2 million people at our 118 special places each year. The Trustees owns and manages 27,000 acres of conservation land and has protected an additional 20,000 acres through conservation restrictions on privately owned land.

The Trustees supports aggressive action to mitigate climate impacts, including state incentives to support the development of solar and other renewable energy facilities across the state, as well as the integration of Natural Climate Solutions in the 2050 Roadmap. However, we remain deeply concerned about siting new, large-scale solar arrays on natural and working lands.

Incentives to Protect Critical Natural Areas

We appreciate your thoughtful approach to conserving critical natural resources, while providing generous incentives to support solar development. We are particularly grateful to DOER for trying to protect BioMap2 areas, including Priority Habitat, Core Habitat and Critical Natural Landscapes. While solar development is not explicitly prohibited on BioMap2 lands, we strongly support solar incentives that steer development away from natural areas needed to ensure the long-term persistence of rare species and their habitats and exemplary natural communities, and urge you to not only maintain but strengthen these provisions in the SMART Solar Regulations.

Incentives to Protect Forested and Agricultural Lands

Natural and working lands are the only tool we possess to draw carbon pollution out of the atmosphere and store it at scale. Forests sequester nearly 12 million metric tons of carbon a year in Massachusetts, and with

conservation and improved management, have the potential to do a lot more. Forests provide climate resiliency benefits, fish and wildlife habitat and drinking water supply recharge. They also stimulate the outdoor recreation industry which produces \$1 billion in tax revenue a year, and the forest products industry which is worth \$3 billion annually. Agricultural lands are also threatened by large scale solar arrays. And yet grasslands make an enormous contribution to climate mitigation and the state's economy, sequestering approximately one-half a metric ton of carbon per acre, per year. Massachusetts' annual total market value for agriculture is over \$475 million, with the average 68-acre farm generating \$65,624 direct per year. And yet, thousands of acres of Massachusetts forests and farms have been fragmented, weakened and permanently converted to solar arrays over the past several years, and this trend is accelerating. The Trustees urges DOER to significantly reduce the impact large-scale ground-mounted solar arrays are having on working lands and to steer development away from greenfields by investing in stronger incentives for solar development on rooftops, parking lot canopies, turf around industrial and commercial buildings and roadways, brownfield sites, inactive gravel pits, landfills, highway cloverleaves and other already-developed properties.

Coordination with State Climate Initiatives

We hope DOER will better coordinate the SMART program with other land conservation and climate programs by more explicitly addressing in the SMART regulations, the intersect between land use and the state's climate mitigation, adaptation and resiliency goals. Programs that should intersect include the Resilient Lands Initiative, State Hazard Mitigation and Climate Adaptation Plan, and Municipal Vulnerability Preparedness program. We should also honor our commitment to the U.S. Climate Alliance's Natural and Working Lands Challenge.

Solar Data Collection and Monitoring

We urge DOER to collect annual data on the total acreage and locations of solar development across the state, to monitor the impact and effectiveness of solar incentives on different land and property types, and to make this information available to the public.

Thank you again for your efforts to protect natural and working lands, and for your consideration. Please feel free to contact me anytime with questions at lorel@thetrustees.org or 617-360-1857.

Sincerely,



Linda Orel
Director of Policy
The Trustees

Cc: Kathleen Theoharides, Secretary, Executive Office of Energy and Environmental Affairs
Dan Sieger, Undersecretary, EEA
David Ismay, Undersecretary, EEA
Kurt Gaertner, Director of Land Policy and Planning, EEA

Founded in 1891 by Charles Eliot, The Trustees preserves, for public use and enjoyment, properties of exceptional scenic, historic, and ecological value in Massachusetts. Today, more than 125 years after our founding, we are Massachusetts' largest conservation and preservation organization and with the support of our 150,000 members we care for 118 properties—nearly 27,000 irreplaceable acres. The Trustees works with a variety of volunteer, nonprofit, and community-based partners in communities across the state to preserve remarkable, scenic landscapes and historic and cultural resources. thetrustees.org