

## SMART Review Comments

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The SMART incentives must align with 2024 realities if our Commonwealth is to remain a leader in addressing climate change.

### **Balance Climate Mitigation and Climate Resilience**

With global CO<sub>2</sub> continuing to rise and extreme climate events increasing, climate resilience is increasingly important. The *Clean Energy and Climate Plan for 2050*, the *Resilient Lands Initiative*, and Mass Audubon's *Growing Solar, Protecting Nature* all stress the need to balance climate mitigation and climate resilience by protecting our Commonwealth's Natural and Working Lands --- our forests, wetlands, and farmlands.

### **Forest Protection**

Massachusetts is losing forests to development and solar arrays are a significant aspect. In the past decade, over 50% of large ground-mounted solar arrays have been constructed on previously forested land. As Climate Chief Melissa Hoffer has stated, "This must stop!" Increased forest carbon sequestration and storage are vital to offset residual emissions if we are to reach our 2050 net-zero emissions goal. As extreme weather increases, New England has experienced increased river flooding. Hillside forests help retain and slow the release of water into streams and rivers following heavy rains. Forest buffers also act as natural filters, slowing infiltration of the water and filtering out contaminants and excess sediment. The natural filtering helps protect our private and public water supplies, such as Boston's water from the Quabbin reservoir.

### **Farmland**

Prime farmland comprises only a small percentage of the Commonwealth's land area and needs to be protected. Extreme weather is impacting global food production, including the 2023 flooding in Western Massachusetts. We need to protect our farmland and ability to grow local food; it is important for our economy, as well as for climate resilience. Dual-use (Agrivoltaics) is a promising approach, but still in the experimental stage, requiring more data on crop yields, best practices, etc. The current SMART regulations should be reviewed frequently. (Ref. my comments below).

### **SMART Goals**

- Align with Commonwealth's Climate Plans, Natural & Working Lands Report
- Protect the health, safety, and welfare of our communities
- Conserve our natural and working lands
- Protect our ecological systems and biodiversity
- Promote economic development, without compromising other goals

***Incentives must be directed to promote solar development on disturbed land (landfills, brownfields, gravel pits, etc.) and in the built environment, particularly parking canopies.***

### **Parking Canopies**

Solar canopies above paved parking lots are the ideal means of significantly expanding solar energy in Massachusetts without large negative impacts. However, installing a solar canopy is more expensive than ground-mounted solar. We urgently need SMART incentives to jump-start and encourage solar canopies over commercial parking lots, such as shopping malls, grocery stores, city parking lots, as well as schools, colleges, municipal areas. This is DOER's best use of my tax dollars!

ADDERS:

Create Adders for  
Parking Canopies  
Brownfields, landfills,  
Rooftops: commercial, municipal, residential  
Remove Adders for  
BioMap3 Core Habitat, Priority habitat, etc.  
Forest Clearing  
Prime Farmland  
Community Solar

### **Ecosystem Protection**

No Adders/ financial incentives for solar arrays on land designated as Core Habitat and Critical Natural Landscapes on Massachusetts GIS BioMap3 (2022) or on land designated as Priority Habitat or Estimated Habitat as defined by Massachusetts Endangered Species Act (MESA). No loopholes or exceptions!

### **Carbon Sequestration, Climate Resilience**

No Adders or incentives for arrays requiring forest clearing larger than 10 acres. Large intact tracts of forest are necessary for carbon sequestration and storage, flood control, biodiversity, wetland protection and other services.

### **Prime Farmland**

No Adders or incentives for ground-mounted arrays on prime farmland, except as described below

For land that is categorized as Prime Farmland or Farmland of Statewide Importance (in accordance with Natural Resources Conservation Service, USDA mapping and criteria) and is being actively farmed or has been actively farmed in the last five years, any LGPI that is over five acres in size shall be developed and operated as an Agrivoltaics Array, meeting the definition of ASTGU (Agricultural Solar Tariff Generation Units) of the Massachusetts SMART program or successor programs

Substitution of other agricultural uses, such as grazing, on prime farmland currently being used for food crops when installing Agrivoltaics is prohibited, unless an equal or larger acreage of prime farmland, not currently being used for farming, is converted to the growth of food crops.

### **Community Solar**

No Adders: The adders are providing a loophole for unregulated solar arrays on forested and prime agricultural land.