



October 9, 2019

Andrew Gottlieb
Executive Director

Judith Judson, Commissioner
Massachusetts Department of Energy Resources

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RE: Straw Proposal for the SMART Program 400 MW Review

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Dear Commissioner Judson:

Maureen O'Shea
Clerk

The Association to Preserve Cape Cod (APCC) submits the following comments on the Straw Proposal for the upcoming revision of the Solar Massachusetts Renewable Target (SMART) program. APCC strongly recommends that the program be revised to include policies that further discourage and significantly reduce the use of undeveloped, forested lands for large-scale solar energy projects.

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Founded in 1968, APCC is the leading regional non-profit environmental advocacy and education organization on Cape Cod. Supported by thousands of members from every Cape Cod town, APCC's mission is to promote policies and programs that foster the preservation of the Cape's natural resources. APCC focuses its efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic.

As a leading voice on Cape Cod calling for more aggressive climate policies on the local, regional, state and federal levels, APCC has been a strong advocate for increases in renewable energy production. Solar energy is a vital part of the Commonwealth's renewable energy portfolio and there is a great need for more responsible solar energy production. Enormous opportunity exists for increased use of solar, especially over parking lots, on existing and new rooftops, and, for larger-scale solar arrays, on landfills, mining sites and brownfields. The SMART program should provide strong financial incentives for solar in these locations.

However, there is a growing trend to overlook these desirable locations in favor of

developing solar arrays on Massachusetts forest and farmland. Given no change in state policy, this trend is certain to increase due to existing economic advantages of greenfield development. As documented by multiple sources, thousands of acres of forest and farmland across the state have already been cleared and developed for solar arrays. Cape Cod communities have recently begun to witness growing interest in large-scale solar development in this region. In many instances, the Cape Cod sites that are chosen by solar developers are undeveloped and forest-covered.

Between 2001 and 2011, Cape Cod lost more than 2,300 acres of forest, with 70 percent of the lost acreage due to various types of development. This loss of forested land has depleted valuable habitats, compromised protection of drinking water supply areas and eroded the many other important ecosystem services that forest resource areas provide to the Cape.

The Cape Cod Regional Policy Plan, which is the region's blueprint for planning and development, places great emphasis on protecting the Cape's remaining forests and habitats by adopting strategies for directing development away from those undeveloped areas and encouraging development in designated activity centers and areas where development is already the predominant land use. APCC calls for changes to the SMART program that adopt a similar strategy by directing the placement of large-scale solar arrays in appropriate locations that avoid clearing additional forest lands.

In fact, the Commonwealth has already recognized the value of protecting and utilizing forests and other natural systems as a climate change tool. The State Hazard Mitigation and Climate Adaptation Plan (SHMCAP), which was codified in the 2018 Environmental Bond, stresses the use of nature-based solutions for climate adaptation and mitigation. SHMCAP defines nature-based solutions as *"The conservation, enhancement, and restoration of nature to reduce emissions, adaptation, and enhance resiliency. These types of solutions use natural systems, mimic natural processes, or work in tandem with traditional engineering approaches to address natural hazards like flooding, erosion, drought, and heat islands."*

Chapter 7 in SHMCAP further highlights the value of preserving forests for their use as an important source of carbon sequestration, stating that *"Massachusetts forests currently absorb more than 15 percent of the carbon generated in Massachusetts every year."*

The DOER SMART solar incentive program should be consistent with state policies such as SHMCAP, as well as other existing state programs and long-established land conservation priorities that strive to protect the valuable natural functions of our forests. These lands increase our resilience to climate impacts and contribute to carbon sequestration in addition to



the other environmental, economic and recreational benefits they offer. APCC recommends that DOER reevaluate and reconfigure the SMART program to reflect this priority.

Thank you for this opportunity to provide comments and for your careful consideration of the above recommendations.

Sincerely,



Andrew Gottlieb
Executive Director



Don Keeran
Assistant Director