



March 4, 2022

The Honorable Michael Barrett, Chair
Joint Committee on Telecommunications, Utilities, and Energy
State House, Room 109-D
Boston, MA 02133

The Honorable Jeffrey Roy, Chair
Joint Committee on Telecommunications, Utilities, and Energy
State House, Room 473B
Boston, MA 02133

Re: H.4331, [*An Act Allowing Municipalities to Reasonably Regulate Solar Siting*](#)

Dear Chairs Barrett, Roy, and members of the Committee on Telecommunications, Utilities, and Energy:

Thank you for your work in addressing climate change and including your ongoing support for increased renewable energy in the Commonwealth. The Appalachian Mountain Club (AMC) supports H.4331, [*An Act Allowing Municipalities to Reasonably Regulate Solar Siting*](#). This bill reaffirms the long-standing powers of Massachusetts towns to regulate land use for many types of development, including renewable energy.

AMC strongly supports the deployment of renewable energy and other actions---including nature-based solutions to capture and store carbon---to address climate change and reach net zero emissions by 2050. We also strongly support actions that ensure the resiliency of our Commonwealth's most critical lands and forests and believe these two goals can be mutually supporting. Many communities in the Commonwealth are in the process of enacting, or have enacted, zoning bylaws that steer large-scale solar development toward the most appropriate locations, and AMC believes this process and guidance will ultimately help bolster the ongoing installation of projects with the support of hosting communities.

Local communities are the entities best suited to determine the areas most appropriate for large-scale solar projects and where the public interest in resources such as forests, farmland, and wetlands for their ecological, climate, and social values are so high that they are not appropriate for certain types of development. For example, criteria AMC recommends that preferred siting locations include:

- Preference for areas of preexisting high disturbance or development, i.e. landfills, brownfields, high cloverleaf interchanges, etc.
- Discourage locations where it would displace prime agricultural land, unique farmland, and additional land of statewide importance.
- Avoid impacts to scenic, ecological, and/or recreational resources.
- Discourage conversion of forested or recently harvested forest lands to solar to



avoid compromising both ecological habitat and forest carbon sequestration.

Industrial-scale solar development has converted 7,687 acres of land to solar arrays in Massachusetts between 2001 and 2019, according to a Clark University study.¹ Of this total, only 12% was on impervious surface or previously developed land. This is consistent with the map analysis done by the MA Department of Energy Resources, showing that an overwhelming majority was “greenfield development”.² At the scale of solar development that will likely be needed to reduce emissions in the Commonwealth, it is important to identify the locations that are most important to protect and to steer development to the locations that are most appropriate. AMC has also recommended statewide planning as part of SMART program updates. Municipal planning and zoning is critical for deploying large-scale solar with predictability both in the near and long term, and the ability of cities and town to reasonably zone for development should be expressly retained through this bill.

Thank you for the opportunity to provide comments on this important legislation. Please contact me at hclish@outdoors.org if AMC can answer questions or provide more information.

Sincerely,

Heather Clish
Senior Director of Conservation & Recreation Policy

Cc:
Representative Oliveria
Representative Blais

¹ <https://taoshiqi.users.earthengine.app/view/solarpanelsbytowns>

² <https://www.mass.gov/service-details/annual-compliance-reports-and-other-publications>