

TO: Mass DOER  
DOER.SMART@state.ma.us  
RE: Public Comment 400 MW Review

Dear DOER:

We are writing on behalf of the undersigned Central and Western Massachusetts land trusts -- and the thousands of residents who support our conservation efforts -- regarding the Greenfield Subtractor siting disincentive under the proposed 400 MW SMART program.

We begin by applauding the Commonwealth's efforts through the SMART program to reduce the carbon footprint of electricity generation in Massachusetts. The land, plants, and wildlife which we strive to protect through our work have already been greatly affected by climate change, and we believe that any alternative energy projects which have a net positive environmental impact should be pursued.

However, we are deeply troubled by the unintended impacts that too many recent large-scale solar projects are having on critical natural resources in our region, and the further damage that current and future proposals threaten. In at least one of our communities, every large undeveloped upland parcel of high conservation value has been proposed for a PV installation.

We sincerely appreciate the fact that DOER included a financial disincentive in the initial SMART program to discourage the development of green field sites; we also second your re-examination of the level of that disincentive in the new proposal.

Yet even with our minimal grasp of the economics involved for applicants, one thing seems clear from both simple calculations and on-the-ground experience in our region: For developers, relative to the simplicity and lower cost of developing greenfield sites, those disincentives have proved negligible. The modest proposed revision of the Greenfield Subtractor will not cure the problem.

We are particularly disheartened to observe that at the same time thousands of acres of developed land where panels could be placed -- from rooftops to parking lots -- have in our region attracted only a handful of PV installations and SMART applications.

Effective measures must be included in the updated SMART program to steer PV projects towards areas which have already lost their natural resources, and away from land which should -- based on every other smart growth principle -- be off limits. We note that the threatened critical natural areas include land that EOEEA agencies are trying to protect.

One means would be a blanket exclusion of conservation target lands by the SMART program: Natural Heritage-designated habitat and landscapes as well as other locally and regionally identified critical natural areas, prime agricultural parcels not subject of Category I applications, EOEEA acquisition priorities, and archaeological and historical sites.

If such a clear-cut standard cannot be adopted, we strongly urge that DOER calculate the cost advantage to developers of building on greenfields, and then set the disincentive multiplier equal to that figure plus a significant additional percentage.

We hope and trust that DOER will reform its important effort to combat climate change to better reflect the Commonwealth's long legacy and current policy of protecting its special places. Thank you for your consideration.

Sincerely,

**East Quabbin Land Trust** | P.O. Box 5, Hardwick, Massachusetts 01037

*Barre, Brookfield, Hardwick, Hubbardston, New Braintree, North Brookfield, Oakham, Petersham, Ware*

**Hilltown Land Trust** | 32 Bullitt Road, Ashfield, Massachusetts 01330

*Ashfield, Chester, Chesterfield, Conway, Cummington, Goshen, Huntington, Middlefield, Plainfield, Westhampton, Williamsburg, Windsor, Worthington*

**Pascommuck Conservation Trust** | P.O. Box 806, Easthampton, Massachusetts 01027

*Easthampton*