From:	Elizabeth Pols
To:	SMART, DOER (ENE)
Subject:	400 MW Review Public Comments
Date:	Friday, September 27, 2019 10:23:40 AM

I attended the DOER SMART program 400MW review held at UMass Amherst on September 5th. Though I appreciated the event, it seemed crafted for solar developers rather than for the public. I was sitting among area residents, most of whom had questions or comments but did not have opportunity to share. Consequently the DOER left without representative feedback from the community.

I serve on Belchertown's Planning Board, as well as on Belchertown's SolarizeMass Committee, so have insights on both small and large solar in our area. The shorthand answer to your "How can we do better?" question is this:

1. Increase incentives for household scale "behind-the-meter" solar. Neighbors who installed their rooftop solar under SREC have received much better incentives than we who are considering doing so under the SMART program expect to. These installations have no negative consequences and serve to build community support for solar and should be encouraged with higher incentives.

2. De-Incentivize COMPLETELY solar projects that involve deforestation. Such projects have no place even in Category 3, let alone Category 2. Eliminate any loophole language that permits incentives for clear cutting. Based on the findings of our best climate scientists, to combat climate change we should be planting trees and forests not cutting them down, even to replace with solar. We should, in fact, consider offering incentives for the preservation of trees.

Belchertown, like many western Massachusetts towns, has just gone through a careful year-long process to revise our solar bylaws in response to the Gold Rush mentality brought about by the SMART programs incentives. These incentives are designed to support our state's admirable goal of racing to become fossil-fuel free before 2045, but have had unintended consequences, particularly with regard to inappropriate land use. These consequences are actually COUNTER-PRODUCTIVE in combatting climate change—presumably the point of the SMART program.

In the last year alone, our Planning Board and Conservation has reviewed 9 large solar applications. Only 2 projects were denied; both on the basis of not meeting special permit requirements. Both projects were ill-conceived and on inappropriate sites. Both developers cited their need for haste "in order to reserve their spot in the queue for SMART incentives." Neither project should have been eligible based on land use impact alone. Each involved clear cutting 40 acres of forested land on steep slopes; each were surrounded by homes.

One project came before the Planning Board eight times over eight months, each time revising their plans in response to negative testimony by expert witnesses. The Board voted unanimously to deny the site approval and special permit. The second project's 4-1 denial came after

5 public hearings. Aside from the meetings themselves, which averaged 4 hours, the Board spent countless hours scrutinizing these constantly revised plans. Both developers are now suing the Planning Board, The Conservation Commission and the Select Board in superior court. The town's resources are being drained by large-scale solar developers intent on pursuing inappropriate sites in large part because of the SMART programs incentives.

I hope that you take this into account as you review and revise the SMART program. You all work so hard towards our goal of 100% renewable and we are grateful and support your efforts. Please take the extra time to craft a policy which will not have the land use impacts that in the end both undermine our shared goals and sour our communities to the very idea of solar.

A quick note on the review session itself: I expected that the conversation would be technical, but the speaker used so many unfamiliar acronyms that a glossary would have been helpful for non-industry participants. The presentation took most of the allotted 2 hours, allowing only a short Q&A session that was dominated by industry representatives and left the public feeling unheard.

Thank you,
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