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To Whom It May Concern:

While the creation of the Solar Massachusetts Renewable Target Program (SMART) comes from good intention and shows considerable thought, there remain serious problems. Please consider the following points:

Land Use and Siting: Since each site has unique complex parameters, it is nearly impossible to adopt a blanket statewide policy. For instance, **forested lands under Chapter 61 are unique and should have their own Category of Land Use.** Currently, they do not adequately fit in any of the three Categories. I would like to see these important lands better protected as they serve as crucial carbon sinks and provide irreplaceable ecosystem functions. Many believe that forests should *never* be removed to install large solar facilities. While the SMART program refers to Core Habitat, Priority Habitat, and Critical Natural Landscape, I find no mention of the Prime Forest designation from the BioMap 2 data. This is a critical omission.

Compliance: We have already seen several dramatic failures of completed solar facilities due to lack of compliance and comprehensive planning. It is one thing to write “no removal of all field soils”, or “address existing soil and water resource concerns that may be impacted”, or “maintain vegetative cover to prevent soil erosion”; but it is another thing to enforce it. **There is no effective mechanism to ensure compliance** and Towns are left trying to fix this in a patchwork manner. This is a huge problem as we most recently have seen in Williamsburg. Your program provides the carrot in terms of financial incentive, but no stick.

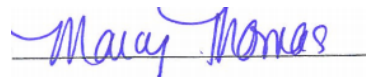
Local control: It should be acknowledged that the intricacies of each proposal cannot be fully appreciated by an organization miles away. **There should be more local control.** Towns should have ample latitude to decide the fate of land within its borders through review by the Conservation Commission, Planning Board, and public input. The local people care about the land, developers from out of state do not. And once the towns make a decision, that decision should, in almost all cases, be honored. The towns should not have to fight large corporations in costly legal battles to defend their decisions. Money earned from

solar power goes directly to large corporations and the towns get little in return. Unfortunately, in some cases the SMART program has inadvertently set the towns up for failure and exploitation. Perhaps we could figure out a way to enrich the towns rather than to impoverish them.

Size: **As the size of a development increases problems and deleterious effects are amplified.** Because of the SMART incentive, many towns have had to scramble to pass solar by-laws to prevent exploitation of their resources, for other towns it is too late.

The incentives: The decision to encourage solar development should be carefully weighed against what we can best predict will be lost. In some cases, we know it is not worth it. Mature contiguous forests are irreplaceable and more effective in long-term mitigation of climate change. **We should be giving landowners incentives to keep their land as farmlands, forests, or cranberry bogs instead of rewarding them for ruining it.** The heritage of the Commonwealth is founded on some of these irreplaceable tracts of land, many of which are not sufficiently protected under this program or under the Core Habitat, Priority Habitat, or Critical Natural Landscape classifications. Please consider revising this program in an even *smarter* way to save the natural resources and characteristics that make this State unique while balancing the need for green energy. Thank you for your consideration.

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