

## Maddalena, Lesley (ENE)

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**From:** Sanford Lewis <sanfordlewis@gmail.com>  
**Sent:** Saturday, January 20, 2024 2:46 PM  
**To:** DOER SMART (ENE)  
**Cc:** tmichelman@seadvantage.com; CBrown@seadvantage.com  
**Subject:** SMART Review Comments

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Regarding SMART review

I am writing to briefly comment regarding the SMART Review. I am an environmental attorney who principally represents Impact and Socially Responsible Investors. In my experience the scope of incentives offered by programs can drive investment and development to the limits and excesses of the incentive programs.

In this instance, incentivizing "community solar" and "public entity status" are being abused by developers incentivized toward inappropriate solar development on agricultural and forested lands. In my opinion, the program should be modified in scope so as to avoid perverse and distorted incentives that undercut the very climate objectives it seeks to promote. No projects should be incentivized, regardless of whether they are community solar or public entity projects, if they involve significant clearcutting or reduction of existing forest sequestration of carbon. Nor are such projects necessary to meet Massachusetts solar and renewable energy objectives. There is ample capacity for rooftop and developed area solar projects to incentivize projects that will not produce contradictory and self-defeating outcomes.

Respectfully submitted,

Sanford Lewis, Attorney  
Shutesbury, MA

Sanford Lewis & Associates  
PO Box 231  
Amherst, MA 01004

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413 992-8297