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CAPE COD  
COMMISSION

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Via Electronic mail [DOER.SMART@mass.gov](mailto:DOER.SMART@mass.gov)

September 27, 2019

Judith Judson, Commissioner,  
Massachusetts Department of Energy Resources

**Re: 400 MW Review Public Comments**

Dear Commissioner Judson:

The Cape Cod Commission is the regional land use, planning, economic development, and regulatory agency for Barnstable County. Under our Act and Regional Policy Plan, the Cape Cod Commission is charged with promoting a variety of different land use goals and values. This often requires that the Commission balance competing but equally important regional goals and values as might arise in its planning and regulatory work.

Commission staff regularly fields calls and holds meetings with those interested in developing large-scale, ground-mounted solar installations in Barnstable County, and getting a better idea of what is involved with Commission permitting. Two of the Commission's current regional policy priorities usually rise to the top in these discussions: the advancement of renewable energy, and preservation of natural resources, including open space protection of undeveloped natural areas.

It usually takes a series of these discussions for a potential applicant to recognize that the Commission can, on balance, support and pursue both priorities; that it is not an "either/ or" proposition. These discussions often have the effect of directing developers to pursue siting on previously developed land. Where this isn't feasible, the Commission requires, as it would for any proposed large-scale "greenfield" development under its review, an open space offset as mitigation for disturbance of natural areas associated with the development. The presence and concentration of various underlying resource areas within these undeveloped areas (e.g. wetlands, Priority Habitat, BioMap2 Core Habitat or Critical Natural Landscapes, etc.) determine the proportion of the required offset in relation to the proposed development, or alternately, whether the land is appropriate for development at all. This balanced approach to siting and mitigation re-affirms the promise of economic and environmental benefits from such projects.

With the foregoing as a backdrop, Commission staff supports guidance that would better direct large-scale ground mounted solar arrays to previously developed land. For projects on Cape Cod requiring Commission review, potential applicants would better recognize at the very commencement of any pre-permitting discussions the breadth of relevant land use concerns and the balance between renewable energy and other important goals with which the Commission is concerned, and it is more likely that these considerations will be addressed at the outset, in the planning stages of development proposals.

Commission staff also supports the establishment of a pollinator certification program. The Commission would recommend that UMass Extension work closely with the various county extension services in Barnstable County and state-wide in developing the pollinator certification program, given the wealth and diversity of eco-systems from place to place across the Commonwealth.

Finally, as feasible given the resources available, Commission staff would support the state's mapping of constructed ground-mounted solar installations throughout the Commonwealth. This would provide valuable land use information to both the public and private sectors in the Commonwealth, and have many potential applications going forward.

Thank you for the opportunity to comment.

Very truly yours,



Kristy Senatori  
Executive Director