

**Concerns from forestland owners about the Land Use Restrictions announced for the DOER Solar Carve-Out Successor Program: <http://www.mass.gov/eea/docs/doer/rps-aps/solar-land-use-guidance-and-information.pdf>**

As forestland property owners in the southeastern part of the Commonwealth, we've observed the development of the Carve-Out successor program with great interest. We are very concerned with the impact that DOER's proposed land use restrictions on solar projects would have on forest landowners' rights to develop solar on their property.

- Solar development also provides important revenues to forest landowners that allows us to continue our forestry operations, maintain existing forests, and plan for retirement.
- Because most projects can be easily decommissioned at the end of their life, solar projects can also serve as a land bank, protecting farm and forest land from more permanent types of development.

As written, the DOER's current list of restrictions would exclude nearly all new projects on forest land from the state's incentive program for solar. As proposed, we understand that over 99% of the Commonwealth's land would be effectively off limits to solar. The remaining 1% may actually be enough land to construct solar capacity enough to meet the 1600 MW goal, but its not considerate of any of the other ingredients needed to support successful solar development, such as:

- Topography
- Shading
- competing uses
- interconnection characteristics
- Utility service territory (we understand that the declining blocks are split between utility based on peak load)

This almost total restriction is extremely overbroad and is likely to curb the growth of solar in Commonwealth and place a governor on the expansion of an industry that has been a great success story in recent years.

As forest landowners we are very familiar with the existing permitting requirements any solar project must comply with: state and local wetlands, species, zoning and tax laws, and Natural Heritage. These existing requirements allow for responsible permitting and additional restrictions are simply not necessary.

In addition to the forestland restriction, we are also very concerned about the precedent that using the Biomap 2, prime farmland, Chapter 60/61A, and prime ranchland designations as a criterion for excluding landowners and businesses from this state program.

We understand and appreciate DOER's concern for protecting our working lands and forests, and for encouraging responsible development. However, we believe strongly that the current

approach would take away our ability to continue developing responsible solar projects on our property, and urge the DOER to reconsider these restrictions.