

Michael Judge
Director, Renewable and Alternative Energy
Massachusetts Department of Energy Resources
100 Cambridge Street, 10th Floor
Boston, MA 02114

October 28, 2016

Re: Next Solar Incentive Straw Proposal

Submitted electronically: DOER.SREC@state.ma.us

Dear Mr. Judge,

The Nature Conservancy appreciates the opportunity to comment on the *Next Solar Incentive Straw Proposal* and for the opportunity to participate in the Land Use and Siting stakeholder group. We applaud DOER and the Administration for developing a process that promotes Solar Renewable Energy Credits (SREC) while at the same time putting measures in place to safeguard land, water and habitat protections, in keeping with the priorities, programs and policies of the Commonwealth.

The Nature Conservancy is a leading conservation organization working around the world to protect ecologically important lands and waters for nature and people. The Conservancy and its members have protected over 22,000 acres of habitat in Massachusetts. And we work with multiple stakeholders, including landowners, communities, agencies, non-profits, businesses and legislators, in support of science-based conservation of lands and waters in a way that maximizes clean water and air, wildlife habitat, recreation, carbon sequestration, and economic benefits.

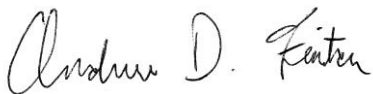
The Nature Conservancy has identified climate change as a top threat to the lands and waters we have worked to conserve, and to both human communities and biodiversity more broadly. We view renewable energy, including solar energy, as part of the solution to reducing harmful greenhouse gases. And we have worked across the US, and globally, to provide information to appropriately site and operate renewable energy generation facilities in order to minimize impacts on lands, waters, and plant and animal habitats.

Massachusetts is a leader in strategies to mitigate both greenhouse gas emissions, and to proactively conserve the Commonwealth's natural resources. To accomplish the latter, the state has developed outstanding data and decision-support tools to optimize conservation of ecological and habitat values. We strongly support DOER's stakeholder process to incentivize solar power development, while working to avoid, minimize, and mitigate the impacts to the Commonwealth's natural resources. We support the development of consistent and transparent siting criteria using best available data and well established decision-support tools, such as *BioMap2*, the state's cutting edge synthesis of important habitats, to proactively inform the application of incentives for solar facilities.

We appreciate DOER's robust stakeholder process and look forward to finding solutions to ensure that siting and incentives support solar programs while simultaneously supporting the Commonwealth's conservation, habitat, and other natural resource goals, priorities, and policies.

Thank you for the opportunity to provide these comments and we look forward to providing more detailed input through the stakeholder process.

Sincerely,

A handwritten signature in black ink that reads "Andrew D. Finton". The signature is written in a cursive, flowing style.

Andy Finton
Climate and Lands Director