



The Trustees  
200 High Street, 4<sup>th</sup> Floor  
Boston, MA 02110

October 27, 2016

Michael Judge  
Director, Renewable and Alternative Energy Development  
Massachusetts Department of Energy Resources  
100 Cambridge Street, Suite 1020, Boston, MA 02114

**Re: Next Solar Incentive Straw Proposal**

Submitted electronically: [DOER.SREC@state.ma.us](mailto:DOER.SREC@state.ma.us)

Dear Mr. Judge,

Thank you for the opportunity to submit comment on the Next Solar Incentive Straw Proposal and for the opportunity to participate in the ongoing **Land Use and Siting** stakeholder group. We applaud the administration for recognizing and addressing conflicts between Solar Renewable Energy Credit (SREC) and land and habitat protection programs and policies of the Commonwealth<sup>1</sup>.

The Trustees is Massachusetts' largest conservation and preservation organization and the nation's first land trust. With our 100,000 members, we conserve some of the best of Massachusetts' natural, scenic, and cultural sites for the public to use and enjoy. We've held our "reservations" in "trust" for 125 years and believe in protecting the irreplaceable for everyone, forever. Today, we care for 116 spectacular and diverse reservations spanning more than 27,000 acres throughout the Commonwealth – from working farms, landscaped and urban gardens, and community parks, to barrier beaches, forests, campgrounds, inns and historic sites – many of which are National Historic Landmarks – located within minutes of every resident.

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<sup>1</sup> April 11, 2016 letter to Sec. Beaton from The Trustees, The Nature Conservancy, Mass Audubon, and Massachusetts Land Trust Coalition

We have been deeply involved in land conservation in the Commonwealth since our founding, and are also deeply concerned about the impacts of climate change on protected lands. We also recognize that all energy infrastructure, including solar, has environmental siting and operation impacts, and that we can work to avoid, minimize, and mitigate these impacts.

As we noted in our previous letter, the Commonwealth has clearly stated land protection requirements through the implementation of Article 97 of the Amendments of the Constitution, call the No Net Loss of Public Conservation Land Policy<sup>2</sup>, and also an 1981 Executive Order 193<sup>3</sup> that recognized “agricultural land in Massachusetts is a finite natural resource that is threatened by competing land use pressure.” Massachusetts is also sophisticated in its land protection, and the Natural Heritage & Endangered Species Program “*BioMap2* is designed to guide strategic biodiversity conservation in Massachusetts over the next decade by focusing land protection and stewardship on the areas that are most critical for ensuring the long-term persistence of rare and other native species and their habitats, exemplary natural communities, and a diversity of ecosystems. *BioMap2* is also designed to include the habitats and species of conservation concern identified in the State Wildlife Action Plan.”<sup>4</sup>

We look forward to working through the stakeholder process to ensure that siting and incentives are not in conflict with the Commonwealth’s established goals, policies and direct funding programs for natural and historic resource protection.

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

Best regards,

A handwritten signature in dark ink, appearing to read "Jennifer Ryan", with a stylized, cursive script.

Jennifer Ryan  
Director of Policy

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<sup>2</sup> <http://www.mass.gov/eea/agencies/mepa/about-mepa/eea-policies/eea-article-97-land-disposition-policy.html>

<sup>3</sup> <http://www.mass.gov/courts/docs/lawlib/eo100-199/eo193.txt>

<sup>4</sup> <http://maps.massgis.state.ma.us/dfg/biomap2.htm>