



# Franklin Regional Council of Governments

Mr. Michael Judge  
Department of Energy Resource  
Director of Renewable Programs  
100 Cambridge St., Suite 1020  
Boston, MA 02114

October 28, 2016

## **Re: Next Generation Solar Incentive Straw Proposal**

Dear Mr. Judge:

We greatly appreciate DOER's effort to continue to expand PV solar deployment in Massachusetts by providing economic support to this sector. However, we request that DOER reexamine the siting criteria that prohibits ground mounted solar projects from being eligible to qualify for program support if sited in the BioMap Core Habitat Area and Critical Landscape areas. This particular MassGIS datalayer covers large areas of Franklin County and combined with other areas where ground mounted projects are proposed to be prohibited appears to exclude most of the land area in Franklin County with the exception of already developed areas. Has DOER mapped the areas proposed to be excluded from eligibility to determine whether certain regions would effectively be unable to participate in the program? We certainly understand that there should be standards to protect valuable resources including prime farmland soils, prime forest land, critical habitat areas and protected open space but would hope that there remain opportunities for our communities to potentially participate in the expansion of solar in the Commonwealth. Many towns in Franklin are actively engaged in supporting energy efficiency and the shift to renewable energy and solar facilities will help reduce our reliance on fossil fuels. It can also provide a source of tax revenues for our many economically disadvantaged towns.

We support DOER's efforts to transition the Commonwealth away from fossil fuels by promoting renewables and energy efficiency as well as your efforts to reduce carbon emissions in order to meet the reduction targets outlined in the Commonwealth's 2008 Global Warming Solutions Act. Please contact Peggy Sloan ([psloan@frcog.org](mailto:psloan@frcog.org)), Director of Planning & Development if you have any questions or would like to further discuss our concern.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Dunlavy", is written over a faint, larger blue signature.

Linda Dunlavy, Executive Director