

April 11, 2016

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA
02114

Dear Secretary Beaton:

On behalf of Mass Audubon, the Massachusetts Land Trust Coalition (MLTC), The Nature Conservancy and The Trustees, we are writing to address growing concerns over state incentives for the construction of utility-scale solar electric generating facilities on farmland, protected open space, and forests.

Over the past two decades our organizations have strongly supported solar energy as integral to meeting our state's clean energy goals and addressing global climate change. More recently, we have seen acres of ecologically and socially valuable (but comparatively inexpensive) land converted to large ground-mounted solar arrays. Inappropriate siting of solar arrays can create conflicts with the Commonwealth's established goals, policies and direct funding programs for natural and historic resource protection.

As the Administration works to develop the next iteration of solar incentives we respectfully request that Massachusetts Department of Energy Resources (DOER) regulations better avoid, minimize and mitigate the impacts of solar projects on natural resource areas, habitat, and forest and agricultural lands. We ask that DOER account for greenhouse gas impacts related to converting land and forests and their ability to sequester carbon. We also urge that financial incentives more strongly promote projects that integrate solar within existing infrastructure and development (e.g. rooftops, parking canopies, and brownfields redevelopment) rather than on greenfields and other clearly delineated sensitive and ecologically important areas.

We strongly recommend that the next phase of the Commonwealth's Solar Renewable Energy Credit (SREC) Program eliminate any incentive for Generation Units sited on:

- Wetland soils
- Agricultural soils of prime or statewide importance
- BioMap2 Core Habitat, including forest blocks ≥ 500 acres
- Designated Priority Habitat of state-listed rare species
- Lands formally conserved through Article 97 status or conservation restriction
- Any Archaeological site listed in the State Register of Historic Places or Inventory of Historic and Archaeological Assets of the Commonwealth

Rapid growth of the solar industry, coupled with robust financial incentive programs have made the Commonwealth a leader in installed solar capacity nationwide. The carve-out portion of the RPS Class I Renewable Energy requirement for distributed solar energy facilities as provided by the Green Communities Act of 2008 has been a key driver in working to meet Commonwealth's target of 1,600 MW installed solar capacity by 2020.

We acknowledge the steps DOER has taken to balance the demand for different types of solar projects by lowering the SREC for 'Managed Growth' projects (e.g. larger than 650 kW which use less than 2/3 electricity on-site) compared with other project types (rooftop, community solar, brownfields, etc.) In addition, DOER has also developed a Model Zoning Bylaw for cities and towns opting to regulate the siting of solar energy systems away from residential areas.

However, despite these actions interest in the 'Managed Growth' sector by the solar industry remains high^{1,2}. We anticipate that the recent statutory increase in the net metering cap will rapidly move many more projects forward without the benefit of a statewide environmental siting criteria framework to help ensure that these facilities are sited in a manner that better balances natural resource protection goals and energy needs. Furthermore, as the industry matures and costs of solar arrays have come down, incentives should be focused on supporting utility scale solar on and within development where electric loads are located. The availability of inexpensive rural land should not be a primary driver of solar siting.

The current SREC incentives do not effectively divert solar projects away from natural resource areas or avoid the conversion of valuable forest and agricultural lands. Furthermore, they do not address the often overlooked environmental risks posed by poorly planned and sited solar energy projects. A recent white paper published by the Association of New Jersey Environmental Commissions³ recommends consideration of environmental and economic risks including stormwater runoff, compromise of sensitive natural resource areas, loss of prime agricultural land and related food supply, loss of wildlife habitat, lack of planning for decommissioning and disposal of solar arrays, and loss of scenic views and cultural landscapes that drive tourism and define our sense of place.

Thank you for considering these comments. We urge the Administration to eliminate incentives for the project types listed above, and ensure that development of clean, renewable solar energy does not undermine the Commonwealth's land conservation and natural resource protection goals.

Please feel free to contact us with any questions.

Sincerely,

¹ <http://www.solsystems.com/blog/tag/massachusetts-managed-growth/>

² http://www.pv-magazine.com/news/details/beitrag/massachusetts-utility-scale-pv-sector-in-danger_100016408/#axzz44yXHhkSG

³ Solar Siting and Sustainable Land Use, Association of New Jersey Environmental Commissions

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