



The Trustees
200 High Street, 4th Floor
Boston, MA 02110

September 1, 2016

Martha's Vineyard Commission
P.O. Box 1447
Oak Bluffs, MA 02557

Re: O.B. Water District Solar Array – OB (DRI 660), Public Hearing September 1, 2016

To Whom It May Concern;

On behalf of The Trustees of Reservations, one of the Commonwealth's largest and old conservation and preservation organizations and one that is very active on Martha's Vineyard, I submit the following comments on the revised proposal to site a solar farm on Water District property abutting the 5,343 acre Manuel Correllus State Forest. The project would require clearing of roughly 10 acres of mature woodland on wellhead protection land, which also functions as a part of the larger State Forest conservation area. While The Trustees firmly supports a transition to renewable energy, and efforts to reduce reliance on climate change inducing fossil fuels, it is important that we not undermine protected open space, natural habitats, and the benefits that they bring. There are clear alternatives to clearing forest, including rooftop, landfill, and parking lot arrays. Of note, healthy forests both sequester carbon and large, intact blocks of forest are better equipped to adapt to a rapidly changing climate.

According to Mass GIS¹, the parcel is municipal open space and is protected under Article 97 of the amendments to the Massachusetts Constitution. Such parcels are subject to the Executive Office of Energy and Environmental Affairs Land Disposition Policy² including review by appropriate town bodies, a hearing and 2/3 affirmative vote of the Great and General Court, and approval by the

¹ <http://www.mass.gov/anf/research-and-tech/it-serv-and-support/application-serv/office-of-geographic-information-massgis/>

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

Governor. Conversion to a use not consistent with Article 97, as well as leases and changes in control for new uses, are subject to Article 97 review and requirements. Article 97 review includes an analysis of lesser impact alternatives to the site as well as full mitigation for the loss of ecosystem function.

Considering these issues, The Trustees urges that alternative sites be identified and pursued and that the mature forest currently protecting water supply and habitat continue to be protected. In addition to the above comments, please see the attached letter regarding solar incentives and protected open space.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jennifer Ryan".

Jennifer Ryan
Director of Policy