

Barnicle, Abby (ENE)

From: Judy McKinley Brewer <jmckbrewer@gmail.com>
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To: DOER SMART (ENE)
Subject: SMART ASTGU Guideline Comments

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Hello -

As a strong supporter of Solar sources for our future sustainability, I am nonetheless very concerned about the Draft guidelines recently issued.

In addition to incentivising locations and actions that fail to benefit resiliency, these guidelines can pose specific problems for smaller towns.

1) First, all *prior conservation actions on farmland* (Agricultural Preservation Restriction, Conservation Restriction or fee ownership by a conservation entity) *must be preserved* from intrusions of solar development.

2) *Incentives need to be applied to more marginal-quality farmlands*, rooftops, brownfields, and other non-prime farmable spaces - not the best available growing and open space.

2) Significant research proving that production of crops that are needed and useful to resilient agriculture can actually be effectively be done. *We need numbers and data on this before such experimentation is incentivised*, other than by research funding.

3) *Detailed guidelines need to be fully developed prior to issuance of incentives.*

Recent experience has shown us that speculative developers race out and start putting up constructions prior to issuance of supporting guidelines.

For instance, in our small town, eight or nine solar installations were proposed and several were installed or approved before the townsfolk rushed a moratorium into place. Constructions on relatively good farmland, in prime hayfield in the center of a residential neighborhood, and requiring clearcutting of many acres of diverse, well-managed forestland "snuck by" before the one-year moratorium and subsequent DEP 17-1 Guidelines were in place.

4) *Third-party review and reviewers (once again, especially for small or non-farming groups) need to be trained and available prior to incentivization.* We need them to have the expertise in terms of experience growing all potential crops, livestock or forage, so that the reviewer can comment substantively on whether the agricultural plan would work in a traditional farm setting, never mind under panels, and 2) that the organization is a neutral party with no conflicts of interest.

Thank you for your time and solicitation of comment. jmckb

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