

SMART public comment

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Tue 5/26/2020 8:57 AM

To: SMART, DOER (ENE) <doer.smart@mass.gov>

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Dear DOER,

thank you for the opportunity to comment on the SMART Emergency Regulation proposed changes.

I am a full-time professional farmer, and I support the Emergency Regulation's tightening of land-use siting guidelines.

I disagree strongly with comments from the Mass Farm Bureau and the solar industry. They neglect to mention that a large proportion of farmland in Massachusetts is owned by non-farmers, and leased to actual farmers.

My hay dealer recently told me that the landowner of one of his best hayfields, who is a medical professional, was keen to convert the 100 acre field to a solar array. The farmer would lose all the income as well as the hay production from that field. As is true all over this state, the financial incentives of landowners are at odds with the interests of farmers. Much, if not most farmland in Massachusetts is owned by non-farmers. To say that solar development benefits farmers is false.

Likewise, the "dual use" idea is unworkable for agriculture lands. I hate to break it to solar engineers, but plants are "solar panels" and no crop that I am aware of benefits from shade. Nor is it possible to conduct field scale ground management (plowing, mowing, etc.) around an obstacle course of poles.

I have become very cynical about the misuse of climate change by the solar industry to grab agricultural, and forested landscapes. These companies, often multi-billion dollar utility companies like "Next Era Energy", are "farming" tax breaks and rate payer subsidies.

Where are the state financial incentives for farmers to build organic matter in soil for carbon sequestration? That would increase the agricultural productivity of our very limited land base, and provide needed income to farmers for providing a public benefit?

Also, the pollinator "adder" is suspect. I have extensive pollinator habitat on my farm, and it requires constant management. Some plants are annuals, some are perennials, and all are in competition with aggressive weeds. This part of the SMART program can not be viable without benchmarks, inspections, and oversight.

Sincerely,

6/1/2020

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