

Eugene & Bonnie L'Etoile
Four Star Farms, Inc
496 Pine Meadow Rd
Northfield, Ma 01360

Feb. 23, 2018

Commissioner Judith Judson
DOER
100 Cambridge St, Suite 1020
Boston, Ma 02114

Dear Commissioner Judson,

My name is Eugene L'Etoile. My wife Bonnie Tucker L'Etoile and I own and operate Four Star Farms, Inc., a diversified family farm in Northfield, Ma, producing grains, flour, hops, and turf for the local and regional markets. We currently farm about 280 acres and employ 6 full time year round employees, 8 seasonal employees, and bring in about \$700,000/yr to the local economy. We believe that Dual Use Solar would be very beneficial to us as it would provide 3 phase power to our farm which would make our farm more environmentally friendly, more efficient, and more cost effective. It would also provide an additional revenue stream that would be more stable than the fluctuating agricultural revenues, and would improve the utilization of our land. It would also provide significant and much needed property tax income to our small town, and would enhance the Commonwealth's goal of increasing renewable energy production and decreasing the production of greenhouse gases.

The following comments reference the:

SOLAR MASSACHUSETTS RENEWABLE TARGET PROGRAM
(225 CMR 20.00)
GUIDELINE
SMART Land Use and Siting Guideline

1. Under: **CATEGORY 1**, fourth line, after **If yes** , replace "only the following types of projects....." with "any of the following types of projects...."

This is just to clarify that not all of bullets must be appropriate, but that any of the bullets are sufficient.

2. Also under **CATEGORY 1**, Third bullet, "Solar Tariff Generation Units sized to meet no greater than 200% of the annual operation load of an agricultural facility", please clarify that the limit on production only applies to NON Dual Use Solar.

The next comments reference:

**SOLAR MASSACHUSETTS RENEWABLE TARGET PROGRAM
(225 CMR 20.00)
GUIDELINE**

Guideline Regarding the Definition of Agricultural Solar Tariff Generation Units

1. Under: **225 CMR 20.00 Regulatory provisions specific to Agricultural Solar Tariff Generation Units, Agricultural Solar Tariff Generation Unit.** All the land in the Commonwealth has the "potential" to meet the definitions in M.G.L. Ch 61A. The paragraph should read "A Solar Tariff Generation Unit located on land in Agricultural Use, Prime Agricultural Farmland as defined by the USDA, or land that has been in Ch 61A in the last 5 years."
2. (d) 1, after "the Solar Tariff Generation Unit will not..." insert the word "significantly". Any change in use or approach can be construed to "interfere" with previous practices, this needs to be clarified to reasonable levels.
3. (d) 4, Replace "in conjunction with UMASS Amherst agricultural extension service" with "after consultation with UMASS Amherst agricultural extension service, outside organizations, and/or experts in the crop, ".

Extension services budgets have been cut considerably, and currently outside extension services and experts are frequently consulted when there is no local expertise due to the diversity of operations and the number of crops grown in the Commonwealth.

4. Under **Additional Provisions for Agricultural Solar Tariff Generation Units,**

Strike 6.

Agricultural Solar Tariff Generation Units in rural areas cannot be placed at such a disadvantage as stated in 6. Most rural areas do not have the 3 phase power that would be required to connect the solar arrays to the grid. The developers would have to upgrade the infrastructure at their own cost, therefore the solar arrays would have to be sized such that they can pay off the investment.

5. Add the following section:

The Commissioner of Agriculture may waive any specific provision that is not contrary to the law or the intent of the regulations when he determines that it is in the best interest of the agricultural production and the Commonwealth

Sincerely,

Eugene & Bonnie L'Etoile

cc (email only): Secretary Matthew Beaton; Assistant Secretary Patrick Woodcock; Assistant Secretary Daniel Sieger; Commissioner John Lebeaux; Senator Stan Rosenberg; Representative Paul Mark

