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Sent: Friday, February 23, 2018 9:51 AM
To: SMART, DOER (ENE)
Cc: Nathan L'Etoile (nletoile@massforestalliance.org); fredheyes@gmail.com
Subject: need to correct: "Definition of Agricultural Solar Tariff Generation Units Guideline"

Thank you for inviting comments to the DOER solar SMART regulations draft guidelines.

As Massachusetts' largest private landowner, my family owned timberland management business depends on our ability to advantage diverse income producing opportunities within our forestry operations.

I'm proud to have with Kestrel Land Trust and MA Fish and Game accomplished the commonwealth's largest private conservation project in history – the 3,486 acre Paul C Jones Working Forest in Leverett and Shutesbury. We are about to complete a second major project adjacent to the first – the 2000acre Walter Cowls Jones Working Forest. Within these 5,500 acres of protected open space, about a third of our holdings, I'd like to reserve a couple percent of the land for higher and better uses and solar is the most advantageous for towns and the state. If I can't do solar on these tiny patches I hold out of the CR for higher and more lucrative uses, I'll probably resort to building subdivisions (a permanent development of the land with high costs to the town and state.)

Beyond arguments against using the same land for subdivisions, solar green energy projects make family forest maintenance viable and viable forests with alternative income streams mean better quality of everything plus outdoor recreational opps for residents. Massachusetts' open space for public recreational access depends on landowners being able to earn revenue from solar green energy production. I am urging you to help forest landowners maintain their land as open space by allowing finite portions of our holdings to earn a livable wage for our family members.

I was pleased to see you worked with Nathan L'Etoile of the MA Forest Alliance in the development of your regulations. We were for the most part quite impressed by the fair results – your focus on the resources in question that needed protection, and not a broad stroke rule that could have prevented virtually all of our rural landscapes from participating in the benefits of solar production. Which as I said, is the difference between viability and not for family forests.

When I read your SMART regulations draft guidelines I was quite upset to see your "Definition of Agricultural Solar Tariff Generation Units." Two provisions, when combined have terrible impacts on the future viability potential of being able to afford to keep maintaining family forests. The first provision causing serious concern is the extreme expansion of what land is considered to be in agricultural use. It contradicts the long deliberated and compromise-filled regulations that in the end read that Agricultural land is defined as having prime soils; land in chapter 61A; or land that has been enrolled in chapter 61A, or fitting the description of land described in chapter 61A sections 1&2; plus land that is used for animal or plant production. NOW the Draft Guidelines have unreasonably and extensively EXPANDED the regulations' provisions to cover any land with the POTENTIAL to be used for either of those two things. This new approach, the adding of the word potential, could include ANYWHERE! The draft guidelines eliminate virtually every open acre in the state – there is almost no land that does not have the potential to be farmed, either to produce plants or animals.

I've just been told that my company makes about \$80 on a tree after maybe 80 years of growth. WE LOVE FORESTRY and forests, and after 9 generations I can tell you that won't stop. But to keep my forests viable and to maintain public access to open space, I need alternative lucrative revenue streams on a small portion of my land so my overall enterprise is economically practicable. If you don't change the Definition of Agricultural Solar Tariff Generation Units Guidelines then the impact on forest land owners will be economically devastating because you have now included every acre of forest, managed or not, productive or not, into the requirements for Dual Use or for producing on farm energy. I am a tree farmer.

This major expansion, combined with the new limit of 2MW per ASTGU means vastly less economic viability for family forest owners. You in effect have capped virtually all ground mounted units at 2 MW, doubled their land use by virtue of the spacing requirements, and mandated that they all be 8 feet or higher. This is unreasonable.

I urge you to continue to work with the MA Forest Alliance to improve the guidelines' wording regarding which land is covered under the scope of agricultural provisions. Adding three million acres to the former list of limitations not only makes family forests less viable, but it also threatens the success and opportunities of the state's solar program and it will reduce public benefits currently enjoyed from economically viable family farms.

Thanks for your time and consideration

Cinda Jones
9th Generation Family Forest Farmer
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