

Maddalena, Lesley (ENE)

From: Fred Beddall <mulchgulch@hotmail.com>
Sent: Thursday, February 1, 2024 10:28 AM
To: DOER SMART (ENE)
Cc: CBrown@SEAdvantage.com; tmichelman@seadvantage.com
Subject: SMART Review Comments

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To Whom It May Concern,

I am writing to comment on the SMART regulations that are meant to guide solar development in Massachusetts. I understand that the DOER is requesting public input.

I am a working farmer – it is my full-time employment, and has been for 26 years. I have worked on many different farms as an employee, as well as my own farm as owner/manager. I am very alarmed by the conversion of farmland to non-farming uses, and in particular, the promotion of land conversion by Massachusetts' policy and tax incentives.

Massachusetts has recently adopted policy to protect and maintain farmland – "The Massachusetts Farmland Action Plan", December 2023. It is imperative that other agencies of the Commonwealth respect that policy and work to support it.

Regarding the SMART subsidy scheme, it is clear that this scheme has been of limited success in directing solar development. There are undoubtedly many reasons for this – including other financial incentives, starting with the (relatively) low price of farmland for solar developers, federal tax incentives, etc, which offset and nullify the effectiveness of the SMART "adders and subtractors" idea. Therefore the first order of policy reform would be to quantify all the other financial incentives to determine just how large the "adders and subtractors" need to be to make more than a marginal difference to solar developers.

The other obvious policy "fix" would be to identify categories of land that should be "off limits" to all solar development, and for the Healey Administration and the Legislature to pass legislation enforcing these prohibitions.

Here are some more targeted suggestions related to the SMART program:

Do NOT incentivize "Dual Use" agriculture installations. They are unproven and drastically reduce the agricultural potential of farmland. As a farmer with 26 years of hands-on experience, I am an expert in farming. Yet the so-called experts designing this "dual use" scheme are not farmers, have never been farmers, and know nothing about the topic.

Please redesign the policy so that any farmland solar is restricted to marginal areas only – headlands, sub-prime soils,

building rooftops, equipment storage yards, etc. Many farms have significant acreage in this category, but it may be dispersed, and less profitable for the solar developer. This is exactly the reason for subsidies – to bridge that gap and make appropriate development competitive.

This time of year I am pruning an orchard. Soon I will be starting seedlings and planning the intensive labor of planting, tending, and harvesting crops. Like all farmers I am underpaid. Farmers need income supplements, but it would be a tragic mistake to degrade the viability of farmland as the price of that support.

sincerely,
Fred Beddall