

From: Greg Wirsen [mailto:greg@gseenv.com]
Sent: Friday, August 23, 2013 4:40 PM
To: SREC, DOER (ENE)
Subject: DOER Solar and Farming Concepts

Dear DOER Team,

I wish to make my comments for the record. The new SREC II policy has created some unintended market consequences for some clients of ours. Small farms are perfect places for solar development. Residents and farmers like the notion of solar, but like it even better when the panels are out of the sight line. Farmers have so many more restrictions and requirements from our other clients: landfills, and brownfields. DOER has developed special programs to deal with those two difficult cases, but has not set stable SREC rates for small farms.

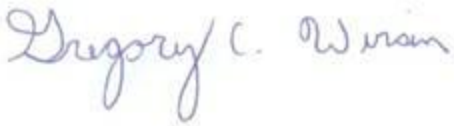
Small farmers are being squeezed down in MgW size, directed to sell only to government bodies, and subject to uncertainties in the financial markets on SRECs. The small farmer has enough trouble surviving, we should do everything we can to help them. We shouldn't just view them as an easy way to extend the solar campaign or control the SREC market for others to benefit by. Farmers are going out of business or selling land for real estate development, because they can't break even by traditional crops. So until solar became viable, their options were to either hang on until you can't, or sell out to a developer. Suburban development causes more town tax burden, and stress on the existing school systems. Ironically, it also increases the electric demand further and further from the cities. This will ultimately increase the distributed generation needs of the communities, and subsequently the reliance on state funding.

Now, solar developers have found ways of combining the panels with agriculture. This preserves farming and farm ownership to another generation. It helps the state go green on power. Small farm solar creates jobs, and it avoids unnecessary farm related bankruptcies. Lastly, it feeds residents who prefer locally produced fresh foods.

We have noticed an increase environmental services as a result of the growing solar industry. That's more commerce, more taxes paid, and more jobs for all. But, the best part is more people are doing the right things for the environmental condition of Massachusetts. You can encourage these benefits by setting a stable floor for SREC rates on electricity produced at small farms that continue to be agriculturally productive. It's one thing, if the farmer is selling out for good. It is something entirely different, if the farmer is in it to grow crops and collect sunshine too. Don't punish those committed farmers that have two or three ways to meet their financial needs at the same time. You should be rewarding that kind of ingenuity, not restricting it. Put small productive farmers on the same plan with landfills, and brownfields.

I look forward to speaking with you about the importance of wise choices regarding the small farms and solar.

Respectfully,

A handwritten signature in blue ink that reads "Gregory C. Wirsan". The signature is written in a cursive style with a large 'G' and a distinct 'W'.

Gregory C Wirsan, MSc.

GREEN SEAL ENVIRONMENTAL, INC.

114 State Road, Building B

Sagamore Beach, MA 02562-2317

Phone: (508) 888-6034

Fax: (508) 888-1506

Cell: (508) 280-8488

E-mail: greg@gseenv.com

www.gseenv.com