

**From:** David Mackley [mailto:initia@comcast.net]  
**Sent:** Thursday, August 22, 2013 8:36 AM  
**To:** SREC, DOER (ENE)  
**Subject:** DOER Suggestions

MA Department of Energy Resources  
From: David Mackley  
RE: SREC-II Ramifications & Suggestions

Dear DOER Team,

I wish to log my complaint in restricting the solar development on farms, which is implied through the recent revised SREC II policy. This will have a dramatic and chilling effect on we small farmers. While I commend DOER for acting bravely in many energy policy areas, it has demonstrated a level of ignorance in terms of unintended market reaction and agricultural wisdom. DOER sits at the converging point of many governing categories of laws and market conditions. The small farmer does not need to carry the burden of restricting the solar incentive market. In fact, the small farmer should be protected from these effects. Finally to make a refined argument, DOER misses the bigger point. After two decades of decline, foreign competition, increased regulation, and scrutiny from the encroaching suburban neighbors that seem to want farms to run like quaint hobby museums -- DOER singles out small farms to control solar incentive growth?

That's DOER's job, not ours. If you want fresh local food for dinner, you must respect small farmers when it counts.

You have disturbed things that weren't broken to ruin the new energy farm jobs, energy independence and economics of small towns, and the struggle of the Massachusetts farmer with this revision in policy. You will see local farms vanish and golf courses convert into solar farms instead. While golf courses are failing and will probably never return to Jack Nicklaus era profitability, there is no social penalty when 30% of golf courses vanish. When 30% of small farmers vanish, society loses in food quality by becoming less fresh, local, and when "farming ethics and know how" are eroded. Once that ethic is lost, it never comes back. And that loss is replaced by foreign grown processed foods that can travel much further than fresh foods. You will be blamed for this foolish policy. Why would you stack the deck against a class of people who already have it very tough? It's sad to see the sport of golf decline, and the entertainment value erode when golf courses consolidate by selling out to solar developers. But there will always be more golf courses than society needs. Contrarily, there will never be enough small farms to feed society.

Small farmers don't want to sell or lease all our land for solar use. We just want to augment our crops with a money-maker so we can stay in business. Farming and solar fit nicely together. We can do both at the same time, and in the exact same space! If I can figure out how to help our towns with the Green Communities Act, create new jobs at every farm, abide by DEP wetlands regulations, observe Chapter 61(a) regulations, cooperate with the Open Space pressures, and the MESA Act; why does DOER provide an unfair market advantage to solar developers who are now soliciting golf courses that will simply sell out and walk away?

Let us do both and we will increase crop production.

We are staying and fighting in an international market against corporations that spew out processed food from thousands of miles away. Those farms employ very low paid wages in states and countries that don't care what is available to eat on our dinner tables in Massachusetts. Times are tough for us too, and we don't want to see Massachusetts farming disappear, so we stay past our graying hair that turns white. It is unfair to limit the use of our land when we have just learned how to blend solar with farming. Golf courses will continue to sell out and quit their businesses entirely. While globally, small farmers in Germany, Australia, and America simply augment crop production with solar. There are experiments underway that use the shade of solar panels to shelter livestock, the grass to feed grazing sheep, the collection of rainwater from panels, the growth of cold temperature lettuces in partially shaded protection, and the new farming of mushrooms from within shade houses formed by the panel overhang. Don't protect or favor golf courses, brownfields, or large farms, while you make it slower and harder to approve a small farmers attempt of converting twenty spare acres to earn life sustaining income for the farm.

Animal life is not endangered by a field over solar panels. Actually birds, insects, mammals are other crawlers don't seem to notice that solar fields are any different from other open pastures that they seem to love. Smart farmers place their solar fields away from communities of people that don't like the visual impact of the technology. Farmers have worked out a relationship with the encroaching suburbs and developments. Most towns either follow the state laws pertaining to solar development or have written their own regulating solar bylaw. Really is there any better location for the citing of a "solar farm" than on an actual farm?

Solar energy generation should be incorporated into all relevant regulations. We should send the message that solar power is not threatening, nor political. It is like the new irrigation technology for farms -- it is a tool. There are still some that are afraid of solar and don't see it actually directly connected to what they often claim they are for: independence from foreign imported oil and an increase in green power. The government has a responsibility of conveying that message. Do it by matching it with the small farm. We all win three times with dual use solar on farms: new jobs, discounted green power, and more fresh food on the table.

Solar development provides a new technology that farmers can get behind, because it directly connects to the earth. There is a natural symmetry of a farmer that protects the land, generates a routine growth and harvest cycle, and applies creative solutions to working within the natural environment. We continue to learn more about internet marketing, Farm CSA's, organically grown crops, and even high finance in order to be competitive and farm in fast changing world. Essentially, we must master all the normal business skills plus be very good at making things grow for your dinner table. The use of new technology has helped us prosper. Solar is another tool that brings in a highly compatible technology that exactly matches our mission. The government should be encouraging this technological development, as it has done in a several decade approach to brownfields redevelopment.

Any farmer that can abide by all environmental regulations and continue to preserve as viable farm crop deserves at least an even break chance against the market competition for arable land to place a solar installation upon. You seem to recognize the import of preserving open space, but ignore the import of a dual use that preserves farm production in the commonwealth. You seem to encourage new technology in the area of brownfields redevelopment, but ignore the contribution that technology makes to farming. Here are some practical rules that shall remove the injustice your new policies have unintentionally created:

\* farmers often have more unused arable acres than we can put to work, and green power is needed everywhere not just in cities,

- \* in farming scale always matters, small farmers assert the right to solar development to 6 or 7 MgW, if they follow all existing land use and oversight authorities rules & regulations,
- \* the farm must continue a "dual use" farming approach when developing solar,
- \* the primary revenue stream must remain agricultural crop production,
- \* DOER will more fully collaborate with other agencies to encourage the implementation and experimentation with new technology to help farmers compete more effectively with global competition and modern business practices,
- \* DOER should pressure the utilities to expedite interconnection agreements for solar projects on small farms,
- \* cities and towns, and public institutions like private and public hospitals and colleges will be encouraged to use solar from dual use farms,
- \* a 3 year transitional period will provide each new dual use farm the time to engage in the acquisition of necessary new permits and rotate to the augmentation of a dual use solar production and agricultural crops, and
- \* legislation is modified to allow the small farmer to utilize any existing farming program(s), APR, Chapter 61 programs, financial incentives as currently exists despite the expanded dual use farming strategy.

These are common sense suggestions to encourage the use of investment capital, government programs, with the good old fashioned farming ethic. I suggest you review the existing programs of the USDA to see how out of step your intended policies are. I am available to share with you the concept of dual use farming that will not be going away. You should capitalize on the movement to work into an overall inter-agency approach to guidance.

You must build upon our strengths, if you want to see small farms around in 100 years. Brownfields and golf courses don't grow a food crop. They shouldn't be favored over a vital industry that could easily miss this technological opportunity. Don't eliminate the solar and farm jobs created, because they will still exist long after the first solar wave has passed.

All my best,

*Mac*

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