

## 2020 APR Listening Session - Written Public Comments

**Categories:** Habitat Support

**Comments:**

We have 17 acres of APR'd grazed lands in Plainfield. I am also the chair of our local Ag. Comm. Both I and the Ag. Comm. are very active in preserving supportive habitats for pollinators and other insects. Much of agriculture is very destructive to insects, the keystones of our various ecosystems. Even grazing and mowing, if done incorrectly, are devastating to these essential insects and other forms of life so vital to the success of agriculture. Habitat and insects in their developing stages can be obliterated. 1) I would like to see APR regulations be more accepting of practices which temporarily use parts of APR's land to support these important life forms. This could include rotation of land in productive use with parts left relatively undisturbed for a season; allowing edges of fields to grow into buffer zones where insects and other animals can find refuge and habitat; relegation of strips of land for beetle banks; and allowing some brush and wood piles to be left in appropriate places for habitat. 2) I was at the listening session at Hampshire College. I found it very interesting and helpful. However, I was amazed that things like paintball fights are allowed on APR's land under special permit. It seems to me that such activities do not increase anyone's appreciation of the nature which supports agriculture and could be very destructive to various forms of life especially on the ground. I hope you consider the "educational" aspects of activities when you issue permits. Too many people are relatively divorced from the intricacies and delicacies of nature. These preserved lands should be used to increase their knowledge instead of fostering their ignorance. 3) I hope you consider uses of APR'd land for such activities of single Tentr sites, carefully placed and regulated for optimum protection of the land and educational opportunities in environmental and agricultural appreciation. Since these are movable and removable sites they could have minimal impact on the land and fit into the pollinator reserves. Waste issues could easily be solved with compostable toilets or use of the Tentr toilet system which packs out waste. It could also be correctly composted and used as fertilizer on pasture land such as mine. This would be a good way to help farmers financially sustain their use of the land. 4) I am unsure how much the APR program considers or regulates the inputs onto the land, such as soil amendments and improvements in variety of flora, especially in pastures. Of great importance to me is the supervision and restriction of pesticides, especially systemic and enduring ones like glyphosate and neonicotinoids. Leaving these poisons in our future environment is destructive and use of them in the present is very damaging to our pollinators, both insect and animal. I realize that you are in a difficult position considering the views and influence of the Farm Bureau about the use of these pesticides. 5) I am also curious about the regulations of home burial on APR'd land. The state allows these private, family green burials. Is this permitted on APR'd land? I am hoping to be buried in my own beloved fields where I spend much of my times each day.

Thank you for listening to the voices of your farmers.

**Categories:** AIP grant eligibility, Marijuana/ Site Visits/ Cell Towers/ Animals

**Comments:**

I was not able to make the meeting last night in Amherst but have a few suggestions to improve the program.1. Open APR land to farm viability program or make AIP program to work as farm viability. Since my farm was put in APR in 1996 long before many of the programs we have today were around I am not allowed to compete for some programs. I think the farm viability program is attractive because it only ties up farms for 5 or 10 years but allows those working it to get access to support needed. I inherited the APR and now am constrained by it in some ways. I was able to get AIP and NRCS support to build a new barn a get planning support 10 years ago. This help is the only reason I am still operating a beef farm today. I would like to be able to apply for funding to upgrade my hay production equipment via accost share grant or something like that. I am using 30+ year old equipment and would like to get newer equipment soon so my youngest son will be interested in continuing the farm. I would also support the ability to have cell towers on APR land. As long as the the site was kept as small as possible and was only a lease of 20 years or so. Similar to solar farms, I feel like these towers would not only provide some funding they would also bring high speed internet to the rural areas around the farms. I am not in favor of APR farms being used for marijuana production. I have a lot of reasons for this but in the end the product has many additional requirements in terms of security, fencing, and other possible negative implications into very rural areas where law enforcement is scarce. Money always brings trouble. I would like the state to formally go on record to support animal husbandry in the state. The internet is full of nonsense about how beef and dairy farms are destroying the planet etc.. As time goes on I am very concerned that our way of life will be challenged by non farming special interests and slowly erode my right to produce food. Lastly I would like to make sure the state minimizes the amount of inspections and on site visits as much as possible. From 1996 to 2013 we had 0 involvement with state inspectors. Since that time we have had 3-5 different inspections, surveys, state hired contractors asking questions etc etc. I am not sure if it was a 'catch up' event or not but I sincerely hope it is not a trend.

**Categories:** APR Sale/ Lease/ Utilization

**Comments:**

My peers and I down here in the "southcoast" area have found that APR properties which come up for sale have been unattainable (because of price). Sometimes local land trusts have joined in the effort to fundraise on behalf of specific farmers, but we have also seen valuable APR farmland being sold to people who are not actively farming it... In other areas I know farmers whose leases on APR properties are terminated because their farm activity is too busy or too messy. Some have been told that they are not allowed to bring other people on to the property (for example their vet!).

**Categories:** Grants

**Comments:**

Farms/farmers/Ag - require assistance in pivoting into 21st century practices to include renewable farm assets (i.e. energy production), expanded farm activities to include broader production of products and sale of products including buy not limited to on site production. Clear language MDAR grants and programs/subsidies to assist farmers in conducting activities within local communities that have zoning bylaws in place or amended bylaws forged to restrict or prohibit farms/farmers from continuing/expanding or adjusting Ag activities to remain financially viable and productive.

Need a streamlined process and broader pool of grant programs to buttress the everIncreasing cost for farms/farmers to modernize and upgrade basic infrastructure and structures.

**Categories:** Special Permits/ Agritourism

**Comments:**

Low-cost high-benefit potentialA common thread among the concerns about nonagricultural uses of APR land is the increased human presence on the land and their potential negative impacts (use of facilities and resource degradation). Obviously, long-term impacts should be minimized, but it is not appropriate to create rules that require zero impacts. Even among the best agricultural practices we make concessions for practicality and viability (such as using land for barns or designating “sacrifice areas” for manure or winter livestock). A similar approach could be used for assessing complimentary nonagricultural uses. While minimizing the potential impacts, we should weight those costs against the potential gains in farm viability and broadened human connection to the land. In the end, catering to tourists through meaningful experiences on our farms might just be among the best ways to finance the growing of healthy regenerative local foods.

**Categories:** Hemp

**Comments:**

Even though the Voters Approved Hemp Growing and Processing in MA in 2016, MA is not taking this Environmental and Economic Development Opportunity seriously. MA is way behind most States. Farms could be Saved, Young Farmers would Stay, New Jobs could be created. Instead Western MA is seeing a Loss of Population as Young Farmers leave to VT, NY, CO, etc. Not good.

**Categories:** Special Permits/ Agritourism

**Comments:**

Support Agritourism A subset of nonagricultural uses, that deserve special (and perhaps more permissive) attention is Agrotourism. These are activities that specifically rely upon and promote the agricultural integrity of the land. Examples might include harvest festivals, farm-to-table events, educational activities, and farm stays (B&B). Encourage Agritourism Again, catering to agritourists through meaningful experiences on our farms might just be among the best ways to finance the preservation of our productive farmlands. These are potentially important diversified revenue streams that compliment the agricultural uses of APR land. Please enthusiastically support appropriate nonagricultural uses of APR land. New Permit CategoriesJust as you have done for solar, please consider dividing the special permit process for nonagricultural uses into categories: Category 1Nonagricultural uses that do not require a permit because they pose no or negligible impact to agricultural uses. Examples might include winter hunting or cross-country skiing, perhaps even hot-air ballooning. Category 2Nonagricultural uses that require a permit, but the granting of permission is guaranteed if specific criteria/requirements are met. (Proscriptive requirements could include limitations on timing, location, volume, compliance, or verification, as necessary.) Category 3 Nonagricultural uses that require a special permit and granting is discretionary. (This is the current system.) Support Predictability From the farmers’ perspective it would be best to have an efficient (quick processing, long-term permissions) system that is also highly predictable. To accomplish this it would be most useful to promulgate criteria/regulations that, if met, would be approved. These might be independently measurable scientific thresholds of land impacts. Alternatively, they could be an evolving list of sufficient or best-practices and activities that are permissible. Minimally, information should be made available as to what has and has not been approved and why, to serve as a guide for potential petitioners. As the nonagricultural use permitting process evolves, one efficiency goal might be to move most common activities into categories 1 or 2, especially when we have some experience or confidence of what works in minimizing negative impacts to the land. One could even envision the program actively promoting specific best practices, just as it does with agricultural technical assistance for example. Category 3 would then be reserved for novel activities or activities of sufficient scale and potential impact that more active oversight were warranted.

**Categories:** Dwelling

**Comments:**

When I conducted a six-year search for protected farmland to acquire on the South Coast, I had to pass on any properties that I could not live on and so wound up going to Rhode Island to find a farm that fit my needs. From my perspective, the APR program -- like most land conservation efforts undertaken by nonprofit land trusts -- seems more geared toward land preservation than preserving farming or maintaining a working landscape that requires farmers to keep the land in production. Our uniquely mild climate on the South Coast and proximity to markets in Boston and Providence make this an ideal region for future farmers to locate, if only they could find housing on their land.

**Categories:** APR Process

**Comments:**

We currently have 105 acres in APR. The APR enabled us to afford to buy our neighbor's land. That particular parcel went through relatively fast and was the only way we could afford it. What deters many from applying is the long time that it takes for the whole process. If decisions whether a parcel would be approved or not could be made in a shorter time frame, more people would apply. In most cases, people can't wait that long for a decision. Even if it takes longer for the funding, if people knew whether or not it was coming, plans could be made and more people would apply. More value should be placed on land that is suitable for grazing. Of course prime land is best, but we have been able to make a profitable business by grazing our land and selling the grass-fed beef. Grazing helps to keep the land open and can use land where crops might not be able to be grown. Grass-fed beef and lamb are very much in demand now.

**Categories:** APR Regulations/ Impervious Surface Area

**Comments:**

Please review this letter and possibly consider what I am telling you regarding exceptions to the APR Program guidelines. It is my hope that you will give the next farmer who applies for an exception request more consideration for future use and the benefit to agriculture that an exception can provide. Our project was to allow 2 large greenhouses to be constructed on our APR land...it did not comply with the 5% coverage and was denied. Please understand that this land has been farmed for many years and as the farmers are no longer able to farm the land it will become overgrown and return to trees and brush. At that time the agricultural use will be gone. Our application was with a company that would have used the land for a 40 year lease for agricultural purposes, and produce vegetables for the New England market for years to come. That opportunity has passed due to the denial and the land will go empty in the near future. I am telling you about this in hope that you will give careful consideration to the next APR farmer that is looking for an exception, keeping a beautiful field in agricultural production is in the best interest of Massachusetts; even if it requires an exception. Please look closely to the long range benefits of agriculture in our beautiful State and perhaps allow something that will be of benefit to the locality and the State while still keeping with the concept of preservation.

**Categories:** Grant eligibility

**Comments:**

My siblings and I inherited the farm we grew up on in Amherst, Massachusetts. Our parents put 54 acres into APR in 1994. The farmland has been farmed continually by Brookfield Farm for 30 years. Brookfield Farm is one of the oldest CSAs in the country and is part of the Biodynamic Farmland Conservation Trust, a non-profit. We would like to do some land management such as improve farm roads and erosion, invasive plant control, incorporate wider buffer strips around fields, clear back vegetation to re-furbish fields, and other land stewardship projects. We have looked into grant programs through APR and have been told that we are not eligible because we are considered the same original owners of the APR land and because the people farming the land are a non-profit, not a commercial entity. If the goal is maintain viable, healthy farmland and promote local farming, it would be helpful if we were eligible for grant programs or other sources of funding. Brookfield Farm supports apprentices every year, mentoring future farmers. And we, as a family, want to be good stewards. The current grant programs are hurting our ability to fulfill these goals, since we are apparently ineligible. Please consider changing the eligibility requirements for your grant programs. We also think the APR program should provide more outreach to APR farmland owners.

**Categories:** Business development

**Comments:**

The most significant comment came at the session at Essex Tech. Dave Dumaresque aka Farmer Dave talked about investing in the APR property and due to the structure of how things are mandated, we are condemning the program to failure from the standpoint that investing in an APR property in terms of business development and infrastructure. Right now, the rules and regulations have you investing on property that is not APR as on an APR property there is not a clear way to recoup your investment. He gave the example of former Soviet Georgia and Moldova who have different approaches to land ownership. The net result is that Moldova has an abundance of production to the point that they export food and Georgia is buying in food as they cannot produce enough for themselves. This fact is so unbelievably important for the continuance of the program's success and the farms solvency and I suggest that we form a task force to investigate and come up with a new approach. This would be seen as cutting edge and ahead of the curve. I am not sure what the answer is but knowing the issue is the first step in finding a solution. I strongly suggest that both the ALPC and The Ag Board look into this approach.

**Categories:** Special Permits/ Agritourism

**Comments:**

Our main concern is to be able to conduct agrotourism events on APR lands. The only way we will be able to stay farming is to further diversify and run events that bring people to our farm. While we wholeheartedly support the APR program ( we own 2 APR parcels ) we do have concern about future uses. As our agricultural industry, tree fruits seems to be disappearing from us as we used to know it. Acreage is way down, volume is down, demand is down for our McIntosh variety. We are constantly planting newer varieties to keep us viable. We ask that the APR committees use good judgement in allowing the uses.

**Categories:** Hemp

**Comments:**

lets talk about the APR farms not allowed to cultivate HEMP or Cannabis. Where do the proposed changes lie in government? Any predictions when we can see that amendment go through

**Categories:** Special Permits/ Agritourism

**Comments:**

I represent Sholan Farms in Leominster. This farm was saved from development through APR & CR funding. We have been working under the APR for 20 years. Unfortunately we have encountered many disappointments both with what we can do on the property and what we can't do. We must comply with the APR regulations - up to and including getting permission to hold the State Envirothon on the property. This event is all about education. Despite the fact that we must comply with APR regulations, we are not permitted to apply for APR improvement grants. This is the peoples farm. The state helped to save it. It would seem logical that the State would want to help see this farm thrive and survive. We are at a distinct disadvantage. We need technical assistance through the APR improvement plan. This would in turn enable us to add venues to the property that would increase functionality and improve our sustainability. We are well aware that most APR farms have received planning assistance along with capital funds to add programs, buildings, etc. Examples include new farmstands, restrooms, kitchens, and operations buildings. We have applied and been denied on several applications.

What do we need to do to have the regulations changed to include municipal and non-profit entities to be eligible for participation in the APR Improvement program? Joanne M DiNardo Sholan Farms Leominster, MA  
01453 www.sholanfarms.com Tel: 978-870-5555

**Categories:** Acquaculture

**Comments:**

I speak as a farmer (not on APR land) and a member of the Easton Agricultural Commission. I would like to express my support for the APR program here in MA. This program has had tremendous benefit for farmers and non-farmers across the state, providing support for farms and farmers and safeguarding farmland for future generations. We owe our thanks to the taxpayers for supporting this program and the state officials who work hard to implement and oversee this vital program.

I have several comments for future improvements to the program: 1. The APR program needs more funding to save more land and support more existing Massachusetts farmers and their farmland. 2. I believe the APR program should focus more effort in protecting and preserving farmland in the eastern half of the state, as farms are being eaten by development at a frightening pace. We can't let these parcels sit on the back burner, they need to be protected now, before it's too late. 3. I concur with the many other farmers who say that APR restrictions need to be mindful of the reality in front of all of us, that agritourism is in so many cases the key to long term financial viability. The APR program needs to make more room for these activities to co-exist with the protections for farmland. 4. Aquaculture is going to be a key part of our food sovereignty in the future, as well as a climate-smart way to produce food. Please work to include more aquaculture parcels and activities in APR designation. 5. Beginning farmers are our future and we need to support them in every way we know how. Having starting new operations before, I can tell you the list of challenges is daunting and the APR program needs to work to make that less so. 6. While I believe solar is critical to the energy conversions we need to be making immediately, I think farmland is not the place to be parking large solar farm. We need farmland for farming, for growing food and raising livestock. Let's keep solar on these large factory roofs, over supermarket parking lots, and on top of old town dumps. Installing large solar arrays on open farmland is certain easy for the the solar installers, but as it destroys or making functionally-unusable large pieces of farmland, we hamstring our future ability to feed ourselves. Many farmers want to install solar to offset their own energy use, which I certain support. But corporate solar farms that ship power back to the grid, away from the farm, aren't the best use of our precious farmland. Thank you for taking comments and letting MA citizens guide the future of the APR program.

**Categories:** Agricultural market

**Comments:**

I see farmland preservation as a lifeboat strategy for future generations to have food production in our region. It may not always be possible to ship food thousands of miles. Local food may come to be a dire necessity, not just a "niche" product.

**Categories:** APR Transparency/ Solar/ Utility Fees

**Comments:**

First, I want to thank you for taking the time to travel the state and consider the opinions of the stakeholders in the APR program. As a first generation farm I probably wouldn't be in the nursery growing business were it not for the APR program. Thank you for your stewardship of this important program. Going forward, it is important to have a transparent process with regards to APR rules and processes. Most of us cannot attend ALPC meetings on a regular basis, so it would be useful to include a link to the meeting minutes with the Commissioner's regular email newsletters. Another area where there could be improvement would be solar regulations. I attended the meeting earlier this month in Amherst and raised this subject. The current APR regulations allow a farm to produce about twice as much energy as the farm consumes. Nobody explained the rationale behind that figure, but I would like to see solar become a tool for farms to use in order to derive income to cover certain fixed costs, such as health insurance, taxes, other energy costs, etc. This is not a proposal for the construction of large scale arrays, instead opting for smaller development on land that is not productive (wet areas, fence lines, roofs, roadway edges, etc). In order for the farm to build a smaller array that produces meaningful income, the farm would have to own it. Certain existing solar industry regulations would have to change to accommodate this kind of modest development. Perhaps this may seem difficult to achieve, but in the end it would help to curtail the development of larger arrays on leased farmland, as farms would not have to develop as much land to realize meaningful income. I propose that MDAR investigate the possibility of a farm exemption from utility interconnection fees, as well as a streamlined and expedited solar installation application track for farms, coupled with financing, to allow farm level solar projects to increase. Farm viability is closely tied to diversified income streams, and solar is a very obvious choice for diversification. Thank you for your consideration.

**Categories:** APR eligibility

**Comments:**

We attended the seminar at Bristol Ag High School. I commented at that forum and have reached out thru email to Dehlia, per her request, who forwarded that info to Ron Hall. I am still awaiting a response. We own an APR parcel on 35 acres in North Attleboro. My family has already placed 300 acres into APR in the 80's. We applied for an APR on 72 acres in Plainville Ma but we're denied due to not being in ag use for the previous 2 years. This property has not changed use but has sat fallow and fell out of Ch 61-A naturally after my parents death. Although it is a stones throw from my North Attleboro APR property, it is not contiguous. My hope is that this property will be re considered. As I understand how the APR program works, it is to preserve and continue to acquire agriculturally feasible land and keep it that way in perpetuity. Changes to the acquisition guidelines would benefit both the landowners that are constantly being courted by large housing developers, as well as the future farmers of America.

**Categories:** APR funding/ ownership/ carbon sequestration

**Comments:**

My principal comment is that I highly support and appreciate the APR program and the dedicated MDAR staff that carry it out. Good work and keep it up! Thanks to APR, I was able to purchase my land at ag value of approximately \$7000 an acre. My neighbor just sold an identical parcel (also unbuildable floodplain) at \$25,000 an acre to a non-farmer. This example demonstrates the importance of APR in the transition of farmland from one owner to another. Farmland is rapidly becoming unaffordable, and unavailable to farmers. For this reason my primary concern with the APR program is the low level of funding for acquisition. I understand the 2020 budget to be \$3 million. At the per-acre price differential above, if MDAR paid the only difference between market price and ag value, MDAR would only be able to protect 166 acres of land. It is clear that the Baker administration places a low priority on preserving our state's dwindling agriculture. proposal 1: Far more money in APR land acquisition fund The Hampshire Gazette recently reported that Massachusetts had the largest percentage of farmland loss of any state in the last ag census. The fact that the state of Massachusetts is subsidizing farmland conversion to solar only makes matters worse. One of the big fallacies of public policy in this state is that farmland owners are farmers. In my experience, this is rarely the case. This distinction means that policies such as the solar subsidy primarily benefit non-farming land owners. I would like MDAR as well as DOER to require land owners proposing solar arrays on farmland to indicate on their application whether they themselves are the farmer. proposal 2: The state should be closely tracking this statistic: how much farmland is owned by farmers versus non-farmers, and whether solar conversions are driving up the cost of farmland for farming purposes. Meanwhile, farmland should be recognized as a carbon sink. Farmers have the tools and the knowledge to increase soil organic matter through well-known practices such as cover cropping and compost additions. However, few farms actually undertake these practices at scale because of the cost. These practices in theory would increase productivity and resiliency of depleted soils (especially retention and absorption of rainfall). proposal 3: The state should be underwriting the expense of carbon storage on farms through direct payments for activities such as long-term cover crops and compost application.

**Categories:** APR owner

**Comments:**

I own APR property in Belchertown. I am and have been acquiring additional contiguous acreage and properties with the intention of protecting and preserving assets already owned. My reasoning at each new purchase has been to #1- own a contiguous water/stream flow #2- own an additional abutting parcel which could have been subdivided #3- own now 2 homes for a tenant/farmer #4- own a railroad corridor which forever increases access throughout the 120+ acres. I have not applied for any funds for any of these acquisitions, all of which benefit the basic value of this APR property, though none are considered "within" the original agreements. Any thoughts on this? I'm looking at additional acreage to purchase, and wondering if/how the APR program could help? As properties are offered to me, which they are, how or could the APR representatives be nimble or quick in their responses to help me, which helps this already forever particular parcel that the State already has rights to? Thanks!



**Categories:** APR Process

**Comments:**

Kestrel Land Trust has worked with MDAR on dozens and dozens of APRs over the past several decades. There has been some great progress, but we are still losing farms. From our perspective, here are the things which need improvement:1) Authorize more state funding. We need enough funding annually to allow every APR to go through. Moving APRs back to an eligibility program, rather than a competitive one would protect more farms in the end.2) Allow the APR to cover the whole farm, not just the statewide and prime soils. Only protecting the field portion of a farm owners property makes negotiations difficult to impossible in some cases to come to a resolution that protects the land at risk.3) Allow land trusts to do preacquisitions of APRs again. When MDAR can't act fast enough we can help. We have figured out a work around when land goes on the market to buy the fee, but when the landowner wants to only sell the APR we are stuck with no options to help the landowner.4) Decrease the timeframe from application to closing to a maximum of 18 months. 3 years is simply too long for landowners to wait. The due diligence process could be sped up. Most other state grant programs for conservation have 12-18 month cycle: LAND, PARC, Conservation Partnership. Use these as models.5) Hire more APR staff for the Pioneer Valley. We need MDAR to help build trusting relationships with farmers. This takes time. Ideally, land trusts are part of this relationship building from the start too.6) Set a strategic goal with the land trust community and agricultural groups to protect most of the remaining farms in Massachusetts by adopting the Wildlands-Woodlands-Farmland-Communities Vision for New England. In the Pioneer Valley that would be about 40,000 acres of active farmland. In 50 years that would be 800 acres/year. We need to set a pace and benchmarks for farm conservation that will actually ensure that farms prosper in the Commonwealth.

**Categories:** APR Value

**Comments:**

i believe we were ripped off in the 1980's by the APR program we were promised to be paid the difference between farm value and construction value we were paid about 10% of that value ongoing payments should be made or some agreements should be revisited , possibly nullified altogether surrounding homeowners enjoy higher values while touting the 'forever ' open space next door, while we, APR land owners are crippled with countless restrictions

**Categories:** Dwelling

**Comments:**

There is a particular piece of APR land that we are interested in. The land is less than 100 acres with about 25% plowable, the rest forest and pond. However, there are only 2 acres of the land right up next to the street where a barn and house can be built. This was the original "design" of the APR for this property when it went into APR. But times change, and we want to create a family farm business on the property because we need more family members involved to make a go of it. We need a total of up to 4 housing lots on the property to accommodate all the family members. The house lots should be "on the back 40", away from the plowable land and not right next to the barn and street. We do not want to live right next to the business (the barn) because we all need to get away from the work for some downtime. We do not want to develop the property, we want to make it accessible for the family. Every time we try to purchase an existing larger piece of land to meet our needs, the sellers see \$\$ in their eyes and sell the property to developers who are the only ones who can afford the land other than the super rich. So we need flexibility to the current APR rules that allow one to tweek the rules to accommodate the costs of running a farm in 2020. Otherwise this property will continue to sit there fallow with no agriculture being done on the property. Again, the current APR does not allow any changes to the original plan. In 2020, we need more flexibility for what a farm looks like because with the high cost of farming and living, we need more family members with access to the land to make it work economically.

**Categories:** Solar/ Grant eligibility

**Comments:**

Grants are very useful to long-time APR farms for things which develop over time, such as encroachment of forest vegetation at field borders. Such grants should be made regularly available, at amounts which can reasonably cover the considerable work involved. We are very grateful for the help of the APR program. Going forward we hope guidelines will relax for solar installations, beyond the current approvals only for limited installations which provide electricity solely for farm power usage. In today's world it would be both globally prudent--reducing our reliance on fossil fuels--and also helpful to farmers, who could better make ends meet through income from solar power to the grid. There are agriculturally sensitive ways to install solar, for instance on roofs, in field locations where a field is non-productive, or in pastures where grazing can occur under and around raised solar panels. Please give this serious consideration. Going forward we hope guidelines will relax for solar installations, beyond the current approvals only for limited installations which provide electricity solely for farm power usage. In today's world it would be both globally prudent--reducing our reliance on fossil fuels--and also helpful to farmers, who could better make ends meet through income from solar power to the grid. There are agriculturally sensitive ways to install solar, for instance on roofs, in field locations where a field is non-productive, or in pastures where grazing can occur under and around raised solar panels. Please give this serious consideration

**Categories:** Solar

**Comments:**

As an APR property owner with a strong commitment to renewable energy, I would like to see the energy usage prerequisite for issuing a COA for ground mounted renewable energy systems revised. Pre-requisite #6 currently requires the solar array energy output not to be greater than two times the documented historical or projected annual agricultural energy use of an APR operation. As a state, Massachusetts has a strong history of working towards increasing energy efficiency in the Commonwealth - Evidence by, for example, by it's a long-standing support for programs like evidence to, for example, by its long-standing support for programs like MassSave. Pre-requisite #6 conflicts with that position because it provides a benefit and perhaps even an inadvertent incentive for farming that consume a lot of energy. Some types of farming will never require large amounts of energy; and this is true for me, as in Organic Bee Keeper in pasture-raised egg farmer. As a beginning female farmer, being able to include income from a solar array would really help promote the revitalization of my family APR farmland. A farming-friendly solar array that can produce and sell energy beyond the current usage restriction would contribute to the long-term viability of my farm. A solar array will absolutely not interfere with my bee farming methods. By installing the solar tall enough that my tractor can pass underneath, and far enough apart to not over shade the ground, I can continue to maintain the soil health while enhancing the pollinator habitat for my bees and wildlife. The current restriction of energy usage is an unfair disadvantage for farmers like me with low energy requirements. On the other hand, farms with high energy usage can install a solar array to help cover expenses, and reinvest revenue back into their farm or into their profit margin. I respectfully request that the restriction be modified from 2.0 times on-farm energy usage to allow for more when all money generated by the array will be reinvested back into the agricultural endeavors of the farm.

**Categories:** Solar

**Comments:**

Although I am strongly against allowing solar electric to be installed on prime agricultural land, I do think that large scale solar arrays should be allowed on APR land that is truly marginal land. In my case, I own one APR parcel that contains about 30 acres of space that is rocky & boulder soil, sloping, and marginally drained. This land is not suitable for any horticultural crops due to the marginal drainage. As a result this land is currently growing invasive plants like autumn olive and multiflora rose. If APR rules allowed, then I could contract with a solar electric installer to install solar panels onto this land instead of the invasive species. The income from this solar would then be able to enable me to keep farming on the prime acres of the APR land that I own. Please reconsider how commercial scale solar arrays are considered in the APR program.

**Categories:** Special Permits/ Agritourism

**Comments:**

We are thrilled you are trying to communicate with us regarding the APR restrictions, But having to fill out Special Permits for all the different events that we try to build a customer base and awareness with is too much paperwork for both of us, your office and our farm, especially knowing how busy we are and how cumbersome paperwork can be. We try different events all the time to bring people to our farms, I don't feel it should be necessary to get special permission from the APR board to do events that do not impact the soil or our farming productivity. We are constantly trying new things to educate our public and bring them to the farms and having to get permission that takes weeks or months to get acceptance for will result in missing our windows of opportunity. With that being said, we come up with new ideas all the time throughout our season so, even if we put it out a list of what we want to try to better the business in the beginning of the year may change and should not be open to scrutiny of what is acceptable as long as we stay within our perimeters of our APR restrictions. Also you have put too much pressure on your existing agents it's hard for them to handle all of your farmers and need to hire more staff, please hire people who have hands on farming experience , not just book or computer farming backgrounds. Please!

**Categories:** Special Permits/ Agritourism

**Comments:**

I represent Sholan Farms in Leominster. Although I have only been volunteering for a couple years and just recently joined the board of directors, I can tell you how crucial this farm is to the city of Leominster and the state of Massachusetts. This farm was saved from development through APR & CR funding. We have been working under the APR for 20 years. Unfortunately, though we comply with APR regulations, we are not permitted to apply for APR improvement grants. We must comply with the APR regulations - up to and including getting permission to hold the State Envirothon on the property. This event is all about education. This farm is run by the people and is the peoples farm. The state helped to save it. It would seem logical that the State would want to help see this farm thrive and survive. Furthermore, we are at a distinct disadvantage. We need technical assistance through the APR improvement plan. This would in turn enable us to add venues to the property that would increase functionality and improve our sustainability. We are well aware that most APR farms have received planning assistance along with capital funds to add programs, buildings, etc. Examples include new farm stands, restrooms, kitchens, and operations buildings. We have applied and been denied on several applications. What do we need to do to have the regulations changed to include municipal and non-profit entities to be eligible for participation in the APR Improvement program?

**Categories:** Special Permits/ Agritourism

**Comments:**

I represent Sholan Farms in Leominster. This farm was saved from development through APR & CR funding. We have been working under the APR for 20 years. Unfortunately, we have encountered many disappointments both with what we can do on the property and what we can't do. We must comply with the APR regulations - up to and including getting permission to hold the State Envirothon on the property. This event is all about education. Even though we must comply with APR regulations we are not permitted to apply for APR improvement grants. This I cannot understand the state helped to save the farm but is not willing to help it succeed. It would seem logical that the State would want to help see this farm thrive and survive. This puts us at a distinct disadvantage. We need technical assistance through the APR improvement plan. We understand most APR farms have received planning assistance along with capital funds to add programs, buildings, etc. Examples include new farm stands, restrooms, kitchens, and operations buildings. We have applied and been denied on several applications. These regulations need to be changed to include municipal and non-profit entities to be eligible for participation in the APR Improvement program? All we ask is to be on the same playing field as everyone else.

**Categories:** Special Permits/ Agritourism

**Comments:**

Dear Commissioner Lebeaux:I am writing to support the farmers in my community who have asked that the APR Program Review explore expanding the program to include a variety of low impact activities that would generate additional revenue for their enterprises while not compromising APR goals, including defining a set of agritourism activities that would be permissible on APR land. I encourage the Department to review the suggestions made by farmers from across the Commonwealth on appropriate nonagricultural uses of APR land that support our farming families and builds support for our local farms by connecting more residents to the agricultural lifestyle in Massachusetts, while protecting the land for agricultural use. For many farmers, these nonagricultural specific activities can provide them with new revenue sources that not only compliment the agricultural uses of APR land, but importantly, help to build connections between farmers and our residents, and support the survival of these farming. These new sources of revenue can in many cases ensure that are farmers can continue to farm as they supplement their growing activities.I have heard that many farmers need and would appreciate very specific guidelines that are eventually publicly posted (online) as to what qualifies for an approval in a special permit process. This would offer predictability, allow them to develop activities that are tailored to the process and create programming that is compatible with MDAR goals. By clearly identifying criteria and describing program features that have already received approval, MDAR would be sharing current best practices and giving farmers information they need to create activities that would lead to approval, decreasing confusion and delays.

**Categories:** Special Permits/ Agritourism

**Comments:**

I support and urge you to consider the suggested approach that changes the existing special permit system to one that recognizes those activities that provide little to no adverse impact on agricultural uses from those that have an impact. As a result, the process would remain discretionary for those that have an impact on agricultural uses. But for those activities which have negligible impact (which would be specified), an easier registration process could be developed in order to facilitate the activity. I support implementing a special permit process that recognizes that special permits ought to be based in the reality of 2020 farming, the need to support farmers to develop different revenue streams to protect their farming, and the recognition that permitting can be based on the varying impacts caused by different uses. By delineating the impacts that conflict with APR goals from those that are compatible, we will be able to support our farmers moving forward. I support an effort by MDAR to define a set of agritourism activities that could be utilized on APR land. I believe the potential gains in farm visibility and access and in protecting farm viability will lead to increased connection to our farms, and ultimately build support and success for our farmers and agricultural uses.Thank you for the opportunity to share my views on this matter. And thank you again for scheduling a public information and listening session on this issue in the Third Hampshire District.Sincerely,Mindy DombState Representative, Third Hampshire District

**Categories:** APR funding/ ownership/ carbon sequestration

**Comments:**

these comments are in addition to my previous comments... A few days ago I learned that the APR acquisition budget used to be as high as \$12 Million per year. We need to get the funding back up to that level or higher.Also learned from MW of Kestrel that there used to be a provision which allowed land trusts to negotiate with landowners to "pre-apply" for APR in situations where timing was a critical factor, but that state and federal funding sources now disallow this. But the state of MA could create some administrative mechanism that would revive this practice. This would be a way to stretch the public funds and leverage the flexibility of private efforts for farmland.Also, I recently heard the story from the owners of KO in Franklin County that their property could not qualify for APR because of lacking prime or statewide soils. We need to create a new expansion of the APR program to draw in these types of farms.On a personal note, I would like to mention that I own an APR farm and feel satisfied that the program does not limit my financial viability in any way. In fact, without APR I wouldn't have been able to even buy the land. Nor do I feel it is the responsibility of APR to make all preserved farms financially viable. If only it were that simple. There are many, many larger economic and social factors at play. I see farmland preservation as a lifeboat strategy for future generations to have food production in our region. It may not always be possible to ship food thousands of miles. Local food may come to be a dire necessity, not just a "niche" product.