



MASSACHUSETTS FARM BUREAU FEDERATION, INC.

"The Voice of Agriculture"

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September 25, 2019

Commissioner Judith Judson
Department of Energy Resources
Suite 1020
100 Cambridge Street
Boston, MA 02114

RE: 400 MW Review Public Comments

Dear Commissioner Judson,

The Massachusetts Farm Bureau Federation is the largest farming organization in the Commonwealth with approximately 6,000 member families. It is on behalf of these members that I am writing to provide comment on the framework presented for the 400 MW Review Straw Proposal – SMART Updates. We are very concerned that the proposed changes threaten to erode the economics of solar projects on farmland.

Massachusetts farmers face all the usual challenges of agriculture – weather, pests, market volatility, etc. Here in the Commonwealth we face additional challenges with income is very seasonal, some of the highest production costs in the world – land, labor and regulatory costs. Solar arrays offer a means by which farms can use a portion of their land to obtain a year-round and dependable income. In many cases, this predictable income allows them to farm the remainder of their land. Without this income, some would have no other choice but to sell or otherwise develop their land.

An unrecognized benefit of solar is that properly constructed solar arrays are easily removed, allowing the land to revert back to agriculture. No other development opportunity offers this flexibility and opportunity to protect farmland in the long term. By creating barriers to farmers installing solar arrays, DOER will in many cases force farmers to convert farmland to uses which will permanently remove land from agriculture – house lots, strip malls, etc.

Incorporating solar for the dual use of harnessing energy and growing crops on the same piece of land is one of the fundamental ways farmers can keep their lands in agricultural use, and while making the farm more financially viable through the sale of energy credits. However, DOER's straw proposal threatens to undermine dual use by increasing the sunlight requirements for dual use.



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There is no evidence from an agricultural standpoint that increasing the sunlight requirements will yield more crops. This is very much a case-by-case determination. This requirement in fact has the potential to increase the installation footprint and decrease energy output. DOER should not be adding further restrictions on a program before it is even off the ground. The proposed DC size limit will reduce the AC size of the projects, thus making dual-use projects even smaller than the original 2 MW AC cap. This DC cap effectively takes the entire dual-use option off the table for farmers.

Farmers are directly threatened with facing the negative impacts of climate change and pride themselves on environmental stewardship. That is why, in addition to the programmatic changes address above, we hope DOER will expand SMART by a *minimum* of 3,200 MW to ensure that Massachusetts can meet its climate change obligations.

It is especially critical to honor and allow "legacy" solar projects that are well into development. Any land use requirement changes should only apply to the program expansion, not retroactively to the existing 1600 MW already approved in the SMART Program. Farmers and solar developer partners collaborate closely to advance solar projects through extensive, local zoning approval processes. Projects that are consistent with local zoning should get some kind of priority (such as eliminating or lowering the greenfield subtractor) because, as a policy matter, DOER should continue to value local approvals as a demonstration of community acceptance

The Department of Energy Resources (DOER) should be embracing this growing partnership amongst farmers and solar generators. The 400 MW Review to the Solar Massachusetts Renewable Target (SMART) Program is an opportunity to build on this progress, and DOER must take steps to update the straw proposal to ensure farmers can continue to access the renewable, solar energy that they desire and benefit from.

As a final note, we encourage DOER to analyze how the proposed rules would impact rural communities. In our rural communities, open space is the predominant landscape. The risk to benefit ratio for land development in rural areas is different than it is inside of 495. Please do not enforce a "Boston perspective" on the rural areas of the Commonwealth. It will both limit economic development in these communities, and a move to renewable energy throughout the Commonwealth. Potential impacts on agricultural land are limited. Analysis suggests that even if 100% of the next 1600 MW were built on farm/wood lands, only about 1% of farm/wood land in Massachusetts would be used for solar.

Thank you for your consideration of our comments. We welcome the opportunity to sit down with DOER and discuss these concerns and working with you to promote responsible, renewable solar energy on farmland across our great Commonwealth.

Should you have any questions, please don't hesitate to contact me.

Sincerely,



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