



October 30, 2020

Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
Email: DOER.SMART@mass.gov
Re: SMART Program ASTGU Straw Proposal

SMART ASTGU Guideline Comments

CISA strengthens farms and engages the community to build the local food economy. We work closely with farms and local food businesses in Hampden, Hampshire, and Franklin Counties and partner with other organizations on statewide projects and activities.

The COVID-19 pandemic has amplified the importance of a robust and resilient local food economy. Farms and local food businesses across the Commonwealth responded with rapidity and creativity to ensure that Massachusetts residents could access local food, relieving challenges created by disruptions in national and global supply chains. Land is the most important limiting factor in the Massachusetts local food economy, and both new and well-established farms are often stymied in their efforts to find and afford good farmland. We are strongly supportive of renewable energy and believe that solar energy production can be a valuable source of additional revenue for Massachusetts farms, but we urge the DOER to create guidelines that ensure that the capacity for food production on high quality farmland is not compromised.

Although dual use solar has promise in some situations, research on dual use solar is preliminary and incomplete. Research to date, for example, has focused on yields, but has not considered important factors such as field management costs when solar panels are in place. The types of farming that can be done under solar panels are very limited. Incentivizing dual use solar risks making valuable Massachusetts farmland useless for many types of production. Existing dual use solar installations provide useful test sites for assessment of the impact of dual use solar and should be fully evaluated before significant expansion of, and taxpayer support for, dual use solar is implemented.

Many farmers rely on rented land, and incentives to place solar facilities on farmland may benefit non-farming owners while reducing land availability for farmers and reducing the capacity for food production in Massachusetts.

Rooftop solar is most compatible with food production and should be prioritized for taxpayer support for solar installations on Massachusetts farms. Ground-mounted solar on farmland should be limited to the least valuable land for agriculture.

Solar policies and incentives in Massachusetts should be in aligned with other state priorities, including farmland preservation policies, the Healthy Soils Action Plan and the Resilient Lands Initiative. Although the development of solar facilities on

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farmland is often inexpensive relative to other options, it can come at a high cost in terms of our ability to feed Massachusetts residents. Massachusetts solar incentive policy should prioritize and incentivize on-farm solar development that does not jeopardize future farm production, and off-farm production on rooftops, parking lots and other locations that have already been developed.

Thank you for our careful review of our comments. We look forward to future opportunities to comment on farm-related solar guidelines.

Sincerely,

A handwritten signature in black ink that reads "Margaret M. Christie". The signature is written in a cursive, flowing style.

Margaret Christie
Special Projects Director