

Barnicle, Abby (ENE)

From: Jim Oldham <jim@equitytrust.org>
Sent: Friday, October 30, 2020 3:38 PM
To: DOER SMART (ENE)
Cc: Johanna Rosen; Jim Oldham
Subject: SMART ASTGU Guideline Comments

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Equity Trust, Inc. is a nonprofit organization based in Western Massachusetts with a nearly 30-year history of working to support farm protection and farmers' access to land. Equity Trust supports agriculture in the Commonwealth for the many environmental, economic, health, and social benefits it provides our communities.

I am writing on behalf of Equity Trust to urge you to protect Massachusetts' farmland from solar development. We are concerned that the proposed approach undermines Massachusetts' strong farmland protection policies, and puts farmland and precious soil resources, as well as farmers and the communities they serve, at risk.

While the idea of "dual use" as described in Massachusetts Department of Energy Resources (DOER)'s SMART Agricultural Solar Tariff Generation Units Straw Proposal is laudable, actual data on the sustainability of agricultural activities under solar panels is limited. The effectiveness of dual-use solar on agricultural lands is far from proven. The state should pause approval of any new dual-use solar installations until existing dual-use solar installations can be studied for a sufficient period of time to determine their impact on agricultural productivity.

While Equity Trust supports the state's efforts to expand renewable energy to combat climate change, we are very concerned about the use of greenfields for large-scale solar development. We strongly urge a much more cautious approach to solar installations on farmland.

The type of farming that can be done under solar panels is very limited.
Encouraging solar installations on farmland would disadvantage many types of farming.

As an organization that has dedicated to countering the many ways farmers lose access to farmland, we are very concerned about the potential that incentives for farm conversion to solar use will benefit non-farmer landowners at the expense of farmers who lease land. This is as true of dual use as ground mounted solar. DOER must develop regulations to address this impact.

If solar is to be sited on farmland at all, it should be sited on the farmland least suitable for farming, not on prime farmland, unique farmland, farmland of statewide importance, or farmland critical to local communities! Furthermore, any solar development on farmland should be subject to third-party review by an organization that 1) is a neutral party with no conflicts of interest, and 2) has sufficient expertise and experience growing all potential crops, livestock, or forage, so that the reviewer can comment substantively on whether the agricultural plan would work in a traditional farm setting, never mind under panels.

Finally, we believe the policy regarding farmland development for solar should align with other state initiatives including the Healthy Soils Plan and the Resilient Lands Initiative. Under no circumstances should conservation of farmland (Agricultural Preservation Restriction, Conservation Restriction or fee ownership by a conservation entity) be permitted to be broken or undone for the purpose of solar development.

Thank you for your consideration of our comments.

Jim Oldham
Executive Director

Equity Trust, Inc.
592 Main Street
PO Box 746
Amherst, MA 01004-0746

413-256-6161
jim@equitytrust.org
equitytrust.org