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From: Marty Dagoberto <marty@nofamass.org>
Sent: Friday, October 30, 2020 1:09 PM
To: DOER SMART (ENE)
Cc: nofamass-policy-committee@googlegroups.com
Subject: SMART ASTGU Guideline Comments

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To whom it may concern;

On behalf of the members of the Northeast Organic Farming Association, Mass. Chapter (NOFA/Mass) - over 1,000 sustainable farmers, gardeners, and organic consumers across the state - I am writing to express our strong concern about the unintended impacts of solar development on farmland.

While we support the state's efforts to expand renewable energy in order to combat the climate crisis, we are very concerned about the use of greenfields for large-scale solar development and want to strongly encourage a cautious approach to siting solar installations on farmland.

Please consider the following:

- 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.
- The effectiveness of dual-use solar on agricultural lands has yet to be proven. The state needs to 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.
- Incentivizing farm conversion to solar may benefit non-farmer landowners but harm farmers who lease land. This is as true of dual use as ground mounted solar. DOER needs to develop regulations to address this dilemma.
- The SMART agricultural adder should be removed as it is pushing/subsidizing dual-use in the state.
- If solar is to be sited on farmland, it should be sited on the farmland least suitable for farming, not on prime farmland, unique farmland and additional land of statewide importance.
- Third-party review should be by an organization that 1) has the expertise in terms of 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, and 2) that the organization is a neutral party with no conflicts of interest.

- The policy regarding farmland development for solar should align with other state initiatives including the Healthy Soils Plan and the Resilient Lands Initiative.
- No conservation on farmland (Agricultural Preservation Restriction, Conservation Restriction or fee ownership by a conservation entity) should be broken or undone for the purpose of solar development.

Thank you for taking these comments into consideration.

Marty Dagoberto L. Driggs

Policy Director

Northeast Organic Farming Association/Massachusetts Chapter (NOFA/Mass)

pronouns: he/him ([Why do I list my pronouns?](#))

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