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From: James A. H. Hafner <jim@landforgood.org>
Sent: Friday, October 30, 2020 4:16 PM
To: DOER SMART (ENE)
Cc: Jae Silverman
Subject: SMART ASTGU Guideline Comments

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To whom it may concern:

Thank you for the opportunity to provide comments on the SMART ASTGU Guidelines.

Land For Good (LFG) has been providing technical support, educational resources, training and policy input on farmland access and transfer issues in MA – and throughout New England – since 2004. Through our farmer education and advising, we educate and consult with hundreds of MA farmers and farmland owners every year. We help farm seekers with land search strategies and tenure agreements, transitioning farmers with farm transfer planning, and non-farmers who own farmland to make it available to commercial farmers.

LFG has an acute awareness of the varied situations, aspirations and challenges facing farmers of all types and stages. This includes the vital role that farmland protection and revenue diversification plays in viable farm businesses, which ultimately keeps land in active farming. We are also acutely aware of the critical role that access to leased farmland plays for small and beginning farms as a strategy to get on land, start and expand farm businesses, and increase farming opportunity in our state. The importance of keeping farmland available to maintain and grow farming opportunity, and to support local and regional production of food and fiber, has never been clearer.

We support the state's efforts to expand renewable energy to combat climate change - and recognize the benefits a solar lease can have for many farmers and farmland owners. However, the Department of Energy Resources (DOER) [SMART Agricultural Solar Tariff Generation Units Straw Proposal](#) that relies in part on dual use (farming activities under elevated solar panels) to expand solar in the state, does raise concerns over large-scale solar development and the displacement of farmers. We encourage a cautious approach to siting solar installations on farmland for the following reasons.

Access to farmland is the top challenge for our next generation of farmers. Given this and the already high cost of quality farmland, many farmers are reliant on leasing, new and beginning farmers. Encouraging solar installations on farmland would disadvantage many types of farming that cannot be done viably under solar panels - and especially by those that rely on leased land. Incentivizing dual use will certainly displace farmers who lease land, simply based lease rates. For this reason, we strongly believe the trade off needs to be examined with more thorough economic analysis at the policy level. (How many farmers will be displaced from leased land? What will the agricultural business and food production impact be?) Based on this, feasible regulations to address this dilemma at the project and state level should be developed.

The effectiveness of dual-use solar farming systems on agricultural lands has yet to be proven under a variety of scenarios and cropping/livestock systems. While the idea of dual-use is laudable, our main concern is over the limited data on the sustainability and profitability of different types of agricultural activities under solar panels. 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.

Similarly, any third-party review of the agricultural component of a dual use proposal should be informed by recent and relevant experimental data. And, the review should be conducted by an organization that is a neutral party with no conflicts of interest, and that has expertise in the production of all the potential crops, livestock or forage. Better science and relevant expertise are critical for ensuring substantive analysis and comments about whether the proposed agricultural system will perform as projected.

If solar is to be sited on farmland, siting on fertile farmland (e.g., prime farmland, unique farmland and additional land of statewide importance) should be avoided and/or justified with rigorous economic and ecological assessment. It is important to recognize that land best suited to grass-based farms (livestock, hay, etc) have even slimmer per-acre economic margins which must be factored into the above analysis.

Finally, the policy regarding farmland development for solar should align with other state initiatives that provide plans and recommendations related to ecological and working lands goals, such as the Healthy Soils Plan and the Resilient Lands Initiative. We must consider these guidelines in the context of the documented loss and ongoing threats to state farmland. US Ag Census data shows an 86,000 acre decrease in land in farms from 1997 to 2017). In addition to commercial/residential development, solar "farms" represent a more recent use conversion threat to Massachusetts farmland. 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.

We recognize there are trade-offs in this policy arena. We hope that additional analysis and input can better balance the short and long term interests of farmland owners, others who rely on that land, and the interests of the farm sector and the public.

Thank you for your consideration.

Sincerely,

James A. Habana Hafner, *Executive Director (Hadley MA)*

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We continue to be available remotely! We're also conducting a limited number of in-person meetings, adhering to all applicable state guidelines.

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