

## Barnicle, Abby (ENE)

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**From:** Mass Audubon <webmaster@massaudubon.org> on behalf of Kathy Richards  
<webmaster@massaudubon.org>  
**Sent:** Monday, October 26, 2020 6:48 PM  
**To:** DOER SMART (ENE)  
**Subject:** SMART ASTGU Guideline Comments

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Oct 26, 2020

Ms. Kaitlin Kelly

Dear Ms. Kelly,

Thank you for your work to expand renewable energy in Massachusetts through improved solar programs and incentives. At a time when we are already seeing the effects of climate change in Massachusetts and around the world, we need to quickly increase our solar capacity to meet our mitigation goals and shift our reliance from fossil fuels to renewable power.

However, I urge you to create some needed safeguards when expanding the siting of solar installations on farmland. While an increase in renewable energy use and access is needed, responsible siting is important. One-quarter of all new development in recent years 6,000 acres - has been conversion of natural lands to solar arrays. Agricultural land is also disappearing - according to the University of Massachusetts' Center for Agriculture, Food and the Environment, Massachusetts farmland decreased by almost 86,000 acres from 1997 to 2017.

While the idea of having a land in "dual use" with solar arrays placed over active farmland sounds attractive, this is still experimental. The state should ensure the land is in fact able to remain in viable agricultural production, and in a way that doesn't disadvantage farmers. Information on actual yield of food products under solar arrays should be required to be submitted and made public annually. The total amount of land enrolled in this program should be limited until more information demonstrates that this approach works.

If solar is to be sited on farmland, it should be sited on the farmland least suitable for farming, and no conservation restrictions or agreements should be broken or undone for the purpose of solar development. I also hope to see the state prevent accelerated loss of forests on farm properties. Athol just enacted stricter regulations for solar but more needs to be done at the state.

Thank you for considering these comments. It's exciting to see renewable energy growing across Massachusetts, but we must ensure that it doesn't come at the expense of our irreplaceable natural and working lands.

Sincerely,

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