

Barnicle, Abby (ENE)

From: Johanna Rosen <johanna.e.rosen@gmail.com>
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To: DOER SMART (ENE)
Subject: SMART ASTGU Guideline Comments

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I am writing to urge you to **protect Massachusetts farmland from solar development.**

With the current pandemic highlighting serious gaps in the ability of all people in the state to securely access food, the importance of protecting land that can support the production of food (and fiber) has never been clearer.

According to the University of Massachusetts' Center for Agriculture, Food in the Environment, the number of acres of Massachusetts farmland decreased by almost 86,000 acres from 1997 to 2017. A report released earlier this year by The American Farmland Trust reported that 7,000 acres of New England agricultural land were lost or threatened per year between 2001 and 2016.

As I've heard said, we can't make more land. I am a farmer in Montague and I also work to protect land in ways that ensure that farmers have affordable and secure land tenure and that communities can count on a secure source of locally-grown/raised food. I know how precious our soil resources are. I also believe in the importance of developing renewable energy sources such as solar. But I think solar panels should be sited on buildings, parking lots, and other spaces that are not our most precious soil resources.

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 at this time.

While I support the state's efforts to expand renewable energy to combat climate change, I am very concerned about the use of greenfields for large-scale solar development and I am writing to urge a much more cautious approach to solar installations on farmland.

Key Points:

- 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 and 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 your consideration.

Johanna Rosen
Meadowhawk Farm
Montague, MA