

Patrick Woodcock, Commissioner

Massachusetts Department of Energy Resources

100 Cambridge Street, #1020

Boston, MA 02114

**By Email at** [DOER.SMART@mass.gov](mailto:DOER.SMART@mass.gov)

RE: SMART ASTGU Guideline Comments

October 30, 2020

Dear Commissioner Woodcock

Thank you for your work in promoting solar power in Massachusetts. Integration of green energy is essential in building a sustainable future as is protecting our farmland. Therefore, we must be careful that the implementation of dual-use solar power, as proposed in the SMART Agricultural Solar Tariff Generation Units Straw Proposal, does not harm Massachusetts farmland or farmers.

Farmland is an integral component of the food production process. With the number of acres of Massachusetts farmland continuously shrinking,[[1]](#footnote-1)[[2]](#footnote-2) maintenance of this land is even more crucial. Solar farms threaten farmland as the types of farming that can be done under solar panels is very limited, disadvantaging certain types of farming. 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 land of statewide importance. Furthemore, 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.

Moreover, dual-use solar threatens farmers as well. While incentivizing farm conversion to solar may benefit non-farmer landowners, it could 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 subsidizing dual-use in the state. While I support the state’s effort to further integrate green energy in order to combat climate change, it is essential that the use of greenfields and farmland for large-scale solar development be approached with an abundance of caution.

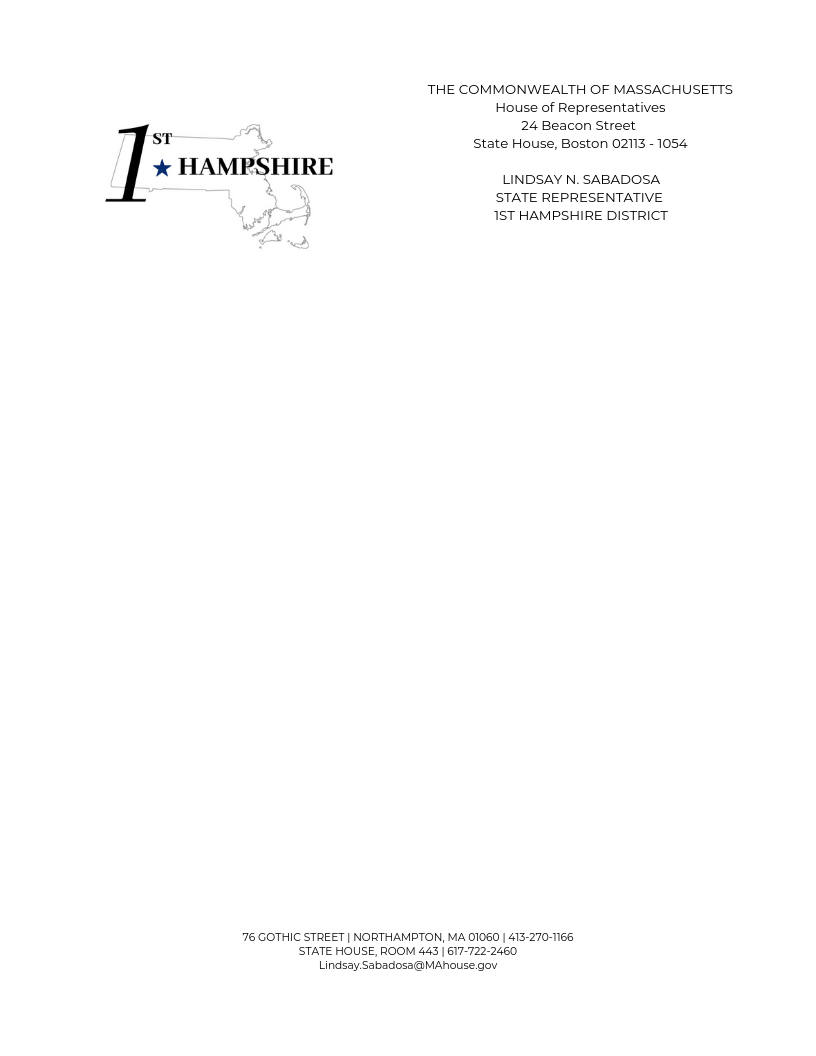
Finally, any third-party review should be by an organization that 1) has the expertise in terms of experience growing all potential crops, livestock or forage, so that the reviewer can comment substantively on whether the agricultural plan would work in a traditional farm setting, never mind under panels, and 2) that the organization is a neutral party with no conflicts of interest.

Thank you for your consideration of these comments and please reach out to me should there be any questions.

Respectfully,

Lindsay N. Sabadosa

State Representative, 1st Hampshire District



1. The number of acres of Massachusetts farmland decreased by almost [86,000 acres](https://urldefense.proofpoint.com/v2/url?u=https-3A__ag.umass.edu_resources_massachusetts-2Dagricultural-2Ddata_acres-2Dland-2Din-2Dfarms&d=DwMFaQ&c=lDF7oMaPKXpkYvev9V-fVahWL0QWnGCCAfCDz1Bns_w&r=tIOvuc1m0EoTB4Dngh39rrUyhHMHmeToi_d_1kIX_R0&m=_Yy1OGJt1gwGgKh5T78Frs7zAFtGW1D3FponlhKsBaA&s=tJkCtn2GuIuTALTEAKo8f1v4pZPSUILfsT0EXwkD5s4&e=) from 1997 to 2017 (University of Massachusetts’ Center for Agriculture) [↑](#footnote-ref-1)
2. 7,000 acres of New England agricultural land were lost or threatened per year between 2001 and 2016 (The American Farmland Trust [Report](https://urldefense.proofpoint.com/v2/url?u=https-3A__farmland.org_american-2Dfarmland-2Dtrust-2Dto-2Drelease-2Dreport-2Ddetailing-2Dthreats-2Dto-2Dnew-2Denglands-2Dfarmland-2Dand-2Dfood-2Dproduction_&d=DwMFaQ&c=lDF7oMaPKXpkYvev9V-fVahWL0QWnGCCAfCDz1Bns_w&r=tIOvuc1m0EoTB4Dngh39rrUyhHMHmeToi_d_1kIX_R0&m=_Yy1OGJt1gwGgKh5T78Frs7zAFtGW1D3FponlhKsBaA&s=iyn9-BmJ8dOduzzSVK1B_TG2b1uvOWcmswxiukjm85E&e=)). [↑](#footnote-ref-2)