



October 27, 2021

Department of Energy Resources  
Attention: Gina Bellato  
100 Cambridge Street, Suite 1020  
Boston, MA 02114  
Email: DOER.SMART@mass.gov  
Re: SMART Guideline Comments

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SMART ASTGU Guideline Comments

CISA strengthens farms and engages the community to build the local food economy. We work closely with farms and local food businesses in Hampden, Hampshire, and Franklin counties and partner with other organizations on statewide projects and activities. Our *Be a Local Hero, Buy Locally Grown*<sup>®</sup> promotion and marketing program includes 262 member farms and 132 food and related business members, such as restaurants, retailers, and institutions.

Farmers in Massachusetts are already confronting the impacts of climate change. The 2021 growing season, marked by prolonged periods of heavy rain, was described by one long-time farmer as “the worst in human memory.” This weather pattern is one of the predicted climate change impacts on the Northeast, and it has many negative consequences for farmers, including crop loss, difficulty accomplishing field work such as planting, cultivation, and harvesting, increased weed and disease pressure, and stress for farm owners and workers.

Decreasing our reliance on fossil fuels and increasing production of renewable energy is one critical strategy for mitigating the impacts of climate change, such as the weather pattern described above. We strongly support the conversion to renewable energy sources and believe government policy and incentives must be used to encourage this transition. However, we also believe that a strong, resilient local food economy is an essential component for climate change adaptation in our region, and that incentivizing dual use solar on high quality farmland could undermine the health and viability of our Commonwealth’s local food economy.

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One of the other crises of our day, the coronavirus pandemic, revealed the importance of a robust and resilient local food economy. Farms and local food businesses across the Commonwealth responded to this crisis with rapidity and creativity to ensure that Massachusetts residents could access local food, relieving challenges created by disruptions in national and global supply chains. Incentivizing dual use solar on our best farmland may limit productivity and cropping choices on that land, constraining our options for responding to current and future crises.

Our primary concern with the current draft guidelines is that they encourage siting of dual use solar on the Commonwealth’s best farmland. Specifically, the requirement that eligible farmland must be in Chapter 61 or be designated as Important Agricultural Farmland (prime, of statewide importance, or unique) makes it more likely that dual use installations will be sited on high quality rather than marginal farmland. Instead, the regulations should prioritize marginal land. This shift would allow farmers to generate electricity and additional income on land that is less suited for crop production, retaining our best agricultural land base for food production now and in the future.

We agree that the requirement in section 5(ii) that Important Farmland to be used for a dual use solar installation must have been producing the designated agricultural commodity for three years does encourage farmers to use more marginal plots, since the agricultural uses that currently appear well-suited for dual-use solar in Massachusetts (grazing and pollinator habitats) are more likely to be sited on marginal land. However, we don't feel that this provision alone is adequate to protect the Commonwealth's best farmland.

We have two additional concerns with the guidelines as currently written. First, we are concerned that there is no provision for ensuring removal of the solar panels and mounting equipment at the end of the useful life of the solar panels if new solar panels will not be installed at that point. This program, and other solar incentive programs in the Commonwealth, should ensure that farmland on which taxpayers support solar installation will be restored to its previous condition so that it can revert to fully agricultural use if it is no longer producing electricity. To ensure that this provision is effective, it should include both a bond or other funding mechanism to ensure that installers will fund the removal of obsolete panels and equipment, and a requirement to create and adhere to a soils plan to ensure that land is restored to its previous condition.

Second, we are concerned that the Massachusetts Department of Agricultural Resources does not have adequate staffing to perform the level of oversight and review required by the guidelines, including monitoring agricultural use, productivity, and proposed changes. If this program is implemented, this data will be important in assessing the success of dual use solar in real world settings, and the Commonwealth should ensure that it can be reviewed and analyzed, not simply collected. MDAR is an important resource and partner for Massachusetts farms and we want to ensure that they have staff capacity to perform both existing and new tasks.

Additional research to better understand the optimal uses for dual use solar in the Commonwealth is important, and we are glad that researchers at UMass Amherst are conducting this research in partnership with farms. In assessing the impacts of dual use solar, this research should consider not only the impact on agricultural yields but other related costs, such as increased management time or the need for new equipment. This research should inform future ASTGU guidelines.

As noted above, we strongly support incentives that help farmers install renewable energy on existing buildings, parking areas, and marginal land, allowing them to generate additional income and contribute to our energy conversion. Specific actions Massachusetts could take to encourage appropriate solar installations on farms include:

- Implement ASTGU guidelines that require applicants to demonstrate that farmland to be used for dual use solar incentives is marginal agricultural land;
- Incentivize solar installations on existing farm buildings, field or road edges, and parking areas;
- Consider strategies to allow additional solar production on marginal land in the APR program; and
- Require electric utilities to fund grid improvements that allow new renewable installations on farms to connect to the grid, rather than requiring the farmer or installer to fund those necessary upgrades.

Land is the most important limiting resource in the Massachusetts local food economy, and both new and well-established farms are often stymied in their efforts to find and afford good farmland. We urge the DOER to create guidelines that ensure that the capacity for food production on high quality farmland is not compromised. Incentivizing dual use solar on our best farmland risks making valuable Massachusetts farmland useless for many types of production.

Solar policies and incentives in Massachusetts should be in aligned with other state priorities,

including farmland preservation policies, the Healthy Soils Action Plan, and the Resilient Lands Initiative. Although the development of solar facilities on farmland is often inexpensive relative to other options, it can come at a high cost in terms of our ability to feed Massachusetts residents. Massachusetts solar incentive policy should prioritize and incentivize on-farm solar development that does not jeopardize future farm production, resilience, and food security.

Thank you for your careful review of our comments. We look forward to future opportunities to comment on farm-related solar guidelines.

Sincerely,

A handwritten signature in black ink that reads "Margaret M. Christie". The signature is written in a cursive, slightly slanted style.

Margaret Christie  
Special Projects Director