

## Protect Massachusetts Farmland from Solar Development

According to the University of Massachusetts' Center for Agriculture, Food in the Environment, between 1997 and 2017 the number of acres of Massachusetts farmland decreased by almost [86,000 acres](#). 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.

In addition to commercial/residential development, there is a new potential threat to Massachusetts farmland in the form of solar development or "solar farms." On September 17, 2020 the MA Department of Energy Resources (DOER) released its [SMART Agricultural Solar Tariff Generation Units Straw Proposal](#), which proposes greatly expanding the use of farmland for solar development throughout the state. In part, the expansion relies on the premise that certain agricultural activities could continue under elevated solar panels. While the idea of such "dual use" is laudable, actual data on the sustainability of agricultural activities under solar panels is limited at this time.

While the Massachusetts Land Trust Coalition (MLTC) supports the state's efforts to expand renewable energy to combat climate change, we intend to submit written comments expressing concern about the use of greenfields for large-scale solar development and encouraging a cautious approach to siting solar installations on farmland.

To submit your own comments to DOER regarding the Agricultural Straw Proposal, submit them before the deadline of **5 pm on Friday, October 30, 2020**. Send them by email to [DOER.SMART@mass.gov](mailto:DOER.SMART@mass.gov) with "SMART ASTGU Guideline Comments" in the subject line.

Key Points MLTC will include in our comments:

- 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.
- Much if not most farmland in Massachusetts is owned by non-farmers. Incentivizing farm conversion to solar may benefit non-farmer landowners but 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.
- Solar 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, 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 APR on farmland should be broken or undone for the purpose of solar development.
- Examples of farmers or farmland owners that may be impacted by dual-use solar.