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Commonwealth of Massachusetts  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Re: Agricultural Systems Guideline Comments

Dear DOER:

Thank you for the proposed updates to the eligibility criteria for projects looking to qualify as a dual-use ASTGU under the SMART Program and for being open to public comments.

We support the proposed changes regarding reducing the DC output to 2.5 MW as well as not allowing an additional solar installation on a piece of land that is contingent to a parcel of land where a solar installation already exists.

We also support the shading and yield updates which would include looking at past trends for solar-covered bogs, as well as ensuring reported yields are accurately taken from bogs that are beneath solar panels. There must be some form of oversight to ensure reported yields are not from elsewhere in the bogs, not under solar, as a way for the bog to meet program yield requirements. This is a critical criteria that must be clearly enforced.

The massive 3.9 MW dual-use solar project proposed by Colorado-based NextSun Energy on an organic bog in Norton proves why these new regulations must be implemented. These out-of-state solar companies attempt to take advantage of new green energy programs for their own profit and to the detriment of the cranberry bogs and surrounding communities. They have no regard for the bogs, surrounding wetlands, nature, wildlife, and potential impact on water quality. The Commonwealth of Massachusetts must protect this organic bog, a beautiful and historic area, surrounded by neighbors on all sides, and located over an ACEC well protection Zone II flood plain. The state must protect its agricultural lands.

We are supporters of the statewide green energy initiative under the SMART Program as well as our local farmers. However, we believe for a project to be seriously considered, it should fulfill the purposes for which the SMART Program is intended and not out-of-state solar companies seeking to profit by exploiting loopholes in the program. These projects will not help local cranberry farmers, as solar companies are purchasing or leasing the property and are not in the cranberry or farming business.

These projects are unprecedented and some solar companies have refused to have any baseline studies done regarding bog production and impact, water quality, environmental impact, health, safety, noise, temperature, or EMF impacts, which leaves numerous questions unanswered regarding the ramifications on the bogs and their neighbors. The lack of experience in implementing and maintaining a project of this magnitude, along with blatant disdain for the legitimate concerns of abutting neighborhoods, gives us enormous concern about the long-term impacts to the cranberry bogs and surrounding environment if a project were to move forward without implementing the newly-proposed regulations.

The SMART Program, which is being subsidized by us, the local customers of the utility companies, was designed to help our local farmers prosper and survive; it should not be used solely as a means for an out-of-state company to purchase land cheaply and derive enormous profits at our expense. Thank you once again for making these important updates to the eligibility criteria.

Sincerely,

*Kenneth L. Knopf*

*Deborah Knopf*

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