

Dear Judith

As a farmer, I was excited to learn that the Department of Energy Resources will be promoting dual use agricultural with solar through the "SMART" program. So I can provide an important source of income to me and my family.

However, the recently issued Agricultural Canopy guidelines would make dual use less attractive than a regular ground mount system, and would make it unworkable for my farm. Unless these guidelines are changed, it will be difficult or impossible for me and other farmers to take advantage of the Agricultural Solar Canopy program.

DOER should make the following changes to the guidelines:

1. Fix the guidelines so they're flexible enough for a range of agricultural dual uses not just row crops. They should take into account historical and present uses instead of unknown, potential future use. Also, you should allow farmers to ask for exemptions from the guideline.
2. Remove the requirement for placing 4 feet of space between each solar panel, or change the requirements so that the spacing is only required between rows not panels. This requirement would make most projects uneconomic. We currently farm next to a conventional ground mounted system which allows more than enough sunlight for grass to grow for grazing cattle.
3. Remove the 50% shading requirement, or change it so that the 50% rule applies across the entire array area, rather than every square foot. This rule makes no sense for many types of agriculture, specially grazing and will make many projects uneconomic.
4. Increase the maximum size of Agricultural Canopy projects to 5 MW to put them on equal playing field with other types of solar projects.

Thank you,

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