

**From:** Maria.Moreira@comcast.net [mailto:Maria.Moreira@comcast.net]  
**Sent:** Friday, February 23, 2018 10:26 AM  
**To:** Palano, Gerald (AGR); internet, env (EEA); Lebeaux, John (AGR); SMART, DOER (ENE)  
**Cc:** 'Maria Moreira'  
**Subject:** SMART Guideline Comments

Dear Sirs:

As a farmer, I was excited to learn that the Department of Energy Resources will be promoting dual use agriculture with solar through the "SMART" program.

Solar can provide an important source of income for our family farm, and I was excited to be able to continue farming while also receiving income by installing a solar facility.

However, the recently issued Agricultural Canopy guidelines would make dual use less attractive than a regular ground mounted 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.

Here are my comments to the Guidelines:

1. Make the Guidelines so they're flexible enough for a range of agricultural dual uses to include small animal grazing such as sheep and goats—not just row crops. We should be able to use historical and present uses instead of unknown uses. Also, you should allow farmers to ask for exceptions from the guideline.
2. Remove the requirement for placing 4 feet of space between each solar panel, or change the requirement so that spacing is only required between rows—not panels. This requirement makes most projects not doable.
3. Remove the height requirements or replace them with more reasonable requirements (e.g., 6-foot minimum height). This requirement adds cost without any real benefit from an agricultural perspective. If a farmer needs a higher clearance, they can negotiate this directly with their solar installer.
4. Remove the 50% shading requirement, or change it so that the 50% rule applies across the entire array area, rather than to every square foot. This rule makes no sense for many types of agriculture (e.g., shade crops and animal grazing), and would make many projects uneconomic.
5. Increase the maximum size of Agricultural Canopy projects to 5 MW to put them on an equal playing field with other types of solar projects.

Thank you,

Maria Moreira

237 Brockelman Rd  
Lancaster, MA 01523  
978-815-2199