

From: Burgundy Brook Farm [mailto:info@burgundybrookfarm.com]
Sent: Friday, February 23, 2018 12:05 PM
To: SMART, DOER (ENE)
Subject: SMART Guideline Comments

Dear Judith,

As an avid farmer, I am 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 to my family and can also provide clean, renewable energy to my town. Furthermore, a dual use program will help to preserve our valued farm land and pave the way for a future of more clean energy. I am excited to be able to continue farming while also receiving income by installing a dual use 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.

I suggest that DOER 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; for example, rotational grazing or hay production. Also, you should allow farmers to ask for exceptions from the guideline to better accommodate various types of farming.
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 would make most projects uneconomic and would restrict the types of farming that can be applied in solar areas. For example, if temporary fencing is needed for rotational grazing, it would be both difficult and costly to fence around each solar panel compared to fencing an entire row of panels.
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 standpoint. 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 simply makes no sense and does apply for many types of agriculture (e.g., shade crops and animal and rotational grazing), and would make many projects uneconomic.

5. Increase the maximum size of Agricultural Canopy projects to 5 MW or 7 MW to put them on an equal playing field with other types of solar projects.

Thank you for taking the time to consider the needs of our family farm.

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