



September 26, 2019

Commissioner Judith Judson  
Massachusetts Department of Energy Resources  
100 Cambridge Street  
Suite 1020  
Boston, MA 02114

**RE: SMART Program 400 MW Review (*via email*)**

Dear Commissioner Judson:

On behalf of the Cape Cod Cranberry Growers' Association (CCCGA), I offer comment on the SMART Program 400 MW review. As currently drafted, these proposed regulations are working counter to the benefit of Massachusetts agriculture and in particular, the cranberry industry. Massachusetts cranberry growers have been in a significant economic decline for many years and for some, having access to solar development projects on their properties or directly on their bogs provides a mechanism to sustain their farms. The proposed changes to the SMART Program will make solar opportunities more challenging for all growers, economically unrealistic for many and others completely out of reach.

Our comments are summarized as follows:

**2.5 MWDC Limitation**

- The 2.5 MWDC on battery storage will prevent some viable cranberry projects from moving forward.
- Growers are often faced with high interconnectivity costs, coupled with height and wider spacing requirements for dual-use ag projects, necessitating larger projects to offset these challenges in order to make the projects economically viable. This often includes DC storage capabilities.
- The stated goals of the SMART Program encourage battery storage, yet this provision will prevent viable projects from succeeding economically.
- The size limitation is arbitrary. If a project makes a farm sustainable, complies with the SMART Program, Agricultural STGU Guidelines, local zoning and all other requirements, the size of the project shouldn't matter.
- At a minimum, some level of flexibility should be incorporated to allow larger projects to succeed and keep farms in business.

**Agricultural STGU Guidelines: Crop Yield Requirements**

- We have not yet seen the proposed Ag STGU Guidelines, but we are concerned that these are being revised without direct stakeholder involvement or adequate scientific research.
- MDAR does not have the experience or knowledge base to determine cranberry crop yield
- Dual-use crop yields have numerous annual variables to consider such as weather impacts, pest infestations, fruit quality, evolving management strategies, experience, etc.
- Utilizing production requirements from other state programs, such as Chapter 61A, makes more sense than arbitrary yield decisions.

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**Cape Cod Cranberry Growers' Association**

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### **Agricultural STGU Guidelines: Sunlight Requirements**

- We have not yet seen the proposed Ag STGU Guidelines, but we are concerned that these are being revised without direct stakeholder involvement or adequate scientific research.
- For cranberries, there is little published guidance on the amount of sunlight required and certainly MDAR does not have the understanding to make recommendations on increasing the sunlight requirements of cranberry vines under solar panels.
- The industry relies on the science of the University of Massachusetts Cranberry Station and this should be the source for any future shading recommendations.
- With a limited body of scientific evidence, altering the sunlight requirements now is subjective and illogical.
- Until more science is obtained on shading impacts from panels on cranberries, it is advisable to not alter the requirements at this time.

### **Prohibition on Tree Cutting:**

- Although not addressed in this review, we are concerned with the exclusion of tree removal for solar projects.
- We understand the impacts that large swaths of tree cutting may have on the environment but not all stands of trees are equal.
- In southeastern Massachusetts, we have many areas of available land that are covered in dead or dying stands of trees. These trees, particularly red pine, have been decimated by drought, insect and disease pressures. Vast quantities of these areas exist and if anything, pose more of a fuel source to wildfires than as a valuable natural resource worthy of protection.
- Including flexibility as to what constitutes a valuable wooded lot should be considered in the program, allowing for the possibility of some of these less desirable areas to be developed for solar.
- Many cranberry farms have limited space opportunity for solar projects and what they do have beyond their bogs is often wooded. Allowing for some of these wood lots, regardless of their condition, to be incorporated into solar projects would allow farms to be saved.
- Some wooded lots should be allowed to be developed for solar on ag properties but with sensible restrictions on size and a requirement for a forestry management plan for added environmental safeguards.

### **Pollinator Habitat:**

- We support the addition of a pollinator adder. Pollinator habitat is an important component of many cranberry farms and it is positive step that the state is recognizing this value and providing credit under the SMART program.
- The pollinator habitat adder value is too low to adequately cover the costs of establishing and maintaining a functioning pollinator habitat.
- There should be a provision for incorporating apiaries as agricultural dual-use.
- Bee keeping is integral to many crops and diversified farms often have habitat and hives that are providing additional income through sales of honey. These ag operations should be recognized.

### **Unique Farmland:**

- We support the specific inclusion of "Unique Farmland" in the definition of "Important Agricultural Farmland". This clarifies that cranberry bog soils can be included in the SMART program.

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### **Including Non-Traditional Crops in SMART:**

- A diversified farm is in better position to ride out low returns. Crops such as apiaries or beach grass are prime examples of commodities that have been utilized on ag land in cranberry operations yet to date have not been included as eligible for dual-use ag adders under the current SMART program.
- Consider having a sliding scale for the agricultural dual-use solar adder rather than the one-size-fits-all adder that currently exists.
- Some commodities may be less lucrative than others and perhaps having a range of adder pricing may recognize these differences while allowing for some less traditional commodity opportunities to be considered for agricultural dual-use.

### **Further Consideration:**

- The agricultural dual-use adder provides more than just an economic benefit to the farmer, it also allows a level of control over their farm and greater consideration for panel placement.
- The provision that the crop under the panels must be farmed in order to maintain the adder helps to keep a farm first mentality in place.
- Dual-use solar is a value that goes beyond economics and helps to keep the farmer's voice heard and more agricultural land in productivity.
- Without the dual-use incentive, solar developers may be able to control more influence over the ag operation, jeopardizing its future value and resources.

### **Conclusion:**

With the implementation of the SMART program, there are opportunities for cranberry growers to participate in solar energy projects and save their farms from financial ruin. However, the proposed regulatory changes could derail many of these prospects. Farming is not just a boutique endeavor; it comes in all shapes and sizes. Limiting the program now in size will eliminate economic possibilities for many cranberry growers. Further, some of the considerations appear to be subjective and arbitrary. More stakeholder and scientific involvement is necessary before invoking changes. CCCGA is prepared to assist the Commonwealth in that regard. Considering other land uses and ag systems under the SMART program should be considered to open even more opportunities for our farming community. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Wick".

Brian Wick  
Executive Director

### **About CCCGA:**

CCCGA represents more than 325 cranberry growers in Southeastern Massachusetts, Cape Cod and Nantucket. Cranberries are the largest agricultural food commodity produced in the state with an annual crop value of \$60.2 million dollars. Massachusetts is home to 30% of all cranberry acreage and according to the most recent Farm Credit East Knowledge Exchange Report, provides over 6,900 jobs and a total economic benefit of over \$1.4 billion to the Massachusetts economy.

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