

202 Bay Road
Norton, MA 02766

November 6, 2019

By E-Mail: doer.smart@mass.gov

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

Re: SMART Program – Agricultural Systems Guideline Comments

Dear Sir / Madam:

Upon consideration of the DOER SMART Program - Agricultural Solar Tariff Generation Unit Guideline proposal and having spent considerable time investigating a proposed dual use project in Norton, I offer the following recommendations:

1. Add a section to the guideline that specifically lays out the steps for automatic removal of the solar installation system when agricultural yield requirements of the crops no longer meet the guidelines of the program.
 - a. For example, if in the 3rd year of crop farming under the solar panels, the crop yields and quality are not meeting applicable guidelines, what specifically happens and when for removal of the solar installation, since the dual use is no longer viable?
 - b. Define the process in specific steps to make applicants aware of the process and to avoid future litigation.
2. Large scale solar development and energy storage systems such as batteries should be prohibited in ACEC's (Areas of Critical Environmental Concern), well protection zones, floodplains and residential neighborhoods.
 - a. The potential risk to aquifers and well water supplies cannot be mitigated.
 - b. Aquifers can be highly permeable and therefore at heightened risk due to inappropriate land uses.
 - c. No long-term studies have been done regarding neighborhood health, safety and home devaluation issues with large-scale solar installations.

3. The use of battery energy storage systems will require amending bylaws in Massachusetts' cities and towns to allow the addition of this incentive under the SMART program.
4. A DC (direct current) capacity maximum based on the number of solar panels is necessary to prevent solar developers from using battery storage systems to circumvent the guidelines.
5. In regard to solar installations over cranberry bogs, experts state that a minimum 3-year study is required to determine if solar installations will negatively impact the commercial viability of the crops beneath.
 - a. Since large scale solar projects have a 25 to 30-year life, reasonable caution suggests that a smaller scale project be first attempted with less than 2.5 MW DC capacity to determine feasibility.
 - b. Without a 3-year study, what happens when the crops fail significantly in the 3rd year? Will the solar installation be removed? At what cost? If the vines remain and decline without significant yield, will the solar installation put the agricultural use out of business?
 - c. It may be better to temporarily and directly bailout the cranberry growers, if that is necessary, rather than to permanently put them out of business with an unproven but hopeful and popular technology.

Please see my comments regarding the 400 MW Review attached and the letter of cranberry grower, David Paquin also attached.

Very truly yours,

Joseph Cogliano

Joseph D. Cogliano, Jr.

Enclosures: 9-27-19 JC 400 MW Review, DP 10-27-19 Dual Use