



February 23, 2018

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

**RE: SMART Program Guidelines for Agricultural Solar Tariff Generation Units (*via email*)**

Dear Commissioner Judson:

On behalf of the Cape Cod Cranberry Growers' Association (CCCGA), I am pleased to comment on the SMART Program Guidelines for agricultural solar tariff generation units. 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 \$68.8 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.

We continue to applaud the work of the Massachusetts Department of Energy Resources, along with other state agencies, in developing a program and guidelines that will enable solar development opportunities on agricultural land. Sensible solar energy projects are much needed in our state and we have vast quantities of available land and growers that are interested in helping to fulfill this void. Many cranberry growers are struggling to maintain their farms and solar development is one area where they may be able to diversify their income, helping to keep their farms sustainable. However, the proposed guidelines for agricultural solar tariff generation units, as written, are going to severely limit their ability to do so. For many potential projects, the guidelines will either push growers to abandon the agricultural land and instead pursue large-scale commercial solar projects or alternatively not allow them to have any viable solar project, thereby losing the farm. Neither scenario is advantageous to the grower or the environment and can't be the intention of the guidelines.

Some changes to the guidelines are required in order to simultaneously increase solar opportunities in the Commonwealth and support working farm land. I recognize that it's difficult to craft a program that will eliminate projects that are masquerading as agriculture but this first attempt will stray too far in the other direction, severely limiting and likely decreasing agriculture in the state.

I propose the following changes be considered in these guidelines.

- 1) An overarching need of the guidelines is to allow more flexibility. Agriculture is not a one-size-fits-all proposition. There are cranberry growers that have the opportunity to farm other crops or graze animals adjacent to their cranberry bogs. This diversified approach, with the addition of solar on these adjacent ag uses, could enable the ENTIRE farm to stay in agriculture – the open space possibilities alone is worth that effort to the Commonwealth.

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**Cape Cod Cranberry Growers' Association**

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- 2) The height restriction proposed does not take into account the different needs of agriculture. The height minimums should be dependent on what agricultural activity is being proposed underneath and needs flexibility.
- 3) The 4-foot row spacing is again very much dependent on the vast array of agriculture that might be proposed underneath the project. Site specific flexibility is required.
- 4) The 50%-shading requirement is again very much dependent on the crops being grown. Nuances of variety and surrounding landscape features can also dictate the shading implications of the plant. This needs to be looked at for each proposed project.
- 5) The 2-MW maximum size of a project is also limiting. Having a larger threshold, such as up to 5-MW will allow for more economically viable projects to be entertained.

Southeastern Massachusetts has large areas of agricultural land that would be suitable for solar projects on land farmed by cranberry growers. Solar energy projects can simultaneously satisfy the energy needs of the Commonwealth and allow farmers to have a sustainable business, preserving open space and water resources, amongst numerous other benefits. The agricultural guidelines, as proposed, will further hinder the future of cranberry (and other) agriculture in the state. As I have commented on previously, including the agricultural sector in the dialog will enable DOER to develop guidelines that will better serve the goals of the SMART Program. CCCGA is willing to assist in this process.

At a minimum, I hope that you consider including some flexibility in the agricultural guidelines. As written, the restrictive and prescriptive nature of the language will certainly add prohibitive costs to what otherwise could have been a viable project. Solar and agriculture do not need to be exclusive business considerations. Thank you for the opportunity to comment.

Sincerely,

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

Brian Wick  
Executive Director

CC:

Michael Judge, Director, Renewable and Alternative Energy Division  
Department of Energy Resources

John Lebeaux, Commissioner  
Department of Agricultural Resources

Gerry Palano, Alternative Energy Specialist, Conservation & Technical Assistance  
Department of Agricultural Resources

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