



July 24, 2025

Elizabeth Mahony, Commissioner  
Massachusetts Department of Energy Resources  
100 Cambridge Street, 9th Floor  
Boston, MA 02114

**RE: SMART 3.0 Emergency Regulations Comments (via email to [DOER.SMART@mass.gov](mailto:DOER.SMART@mass.gov))**

Dear Commissioner Mahony:

The Cape Cod Cranberry Growers' Association (CCCGA) is writing with concerns for the proposed SMART 3.0 Emergency Regulations. We are concerned with the following two sections of 225 CMR 28.00 Solar Massachusetts Renewable Target (SMART) Program 3.0.

**S.28.07 Program Eligibility, Sub-section 5, Special Eligibility Criteria for STGUs (b) Locational Compensation Rate Adders (4) Floating STGUs (d) Interconnection Application Date Requirement**

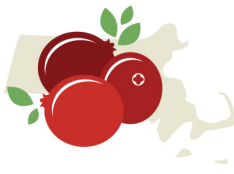
We have several growers actively exploring the feasibility of floating solar as an alternative income generator for their farm. Requiring a project to have submitted an interconnection service agreement by January 1, 2025 will eliminate many potential projects from moving forward. Without warning, having a date that has now passed will force growers to abandon this opportunity. Floating solar offers a solid prospect for growers to generate green energy and additional income on a resource area that is not providing any financial benefit beyond the obvious needed use of the water source.

We recommend either changing this date to some time in the future or eliminating it completely. We don't understand why floating solar is in effect being shut down before it has been established in any appreciable manner.

***S.28.08 Land Use, Sub-section 1, Ineligible Land, (a) Wetland Resource Areas, including Buffer Zones***

We strongly encourage DOER to reconsider the ineligibility of wetland resource areas and buffer zones. As you know, most Massachusetts cranberry bogs are considered wetland resource areas under the state's Wetland Protection Act Regulations, 310 CMR 10.04. Further, much of our grower's adjacent or related support land would fit the definition of buffer zone. This language would thus eliminate virtually any solar opportunities on their farms. This would certainly preclude agrivoltaic (i.e. dual-use) projects and many ground-mounted solar projects.

We suggest allowing solar as an exception/exemption for active cranberry farms in these resource areas.



**MASSACHUSETTS  
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### **Summary**

Cranberry farming can be economically challenging and having opportunities for alternative income streams through the use of solar projects is a viable pathway for some of our growers to sustain their farms for today and future generations. This alternative energy pathway was identified in the 2016 Cranberry Industry Revitalization Task Force final report, which DOER was a member. The aforementioned proposed changes to these regulations would eliminate solar as an option for most of our farms, particularly our small and mid-size farms that have limited land available.

Please contact me with any further questions at 508-866-7878 ext.14 or [bwick@cranberries.org](mailto:bwick@cranberries.org).

Sincerely,

Brian A. Wick  
Executive Director

### **About CCCGA:**

CCCGA represents more than 300 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 \$70.3 million dollars. Massachusetts is home to 30% of all cranberry acreage and according to the most recent Farm Credit East Knowledge Exchange Report, provides nearly 6,400 jobs and a total economic benefit of over \$1.7 billion to the Massachusetts economy.