

To: The Department of Energy Resources  
via e-mail at [DOER.SMART@mass.gov](mailto:DOER.SMART@mass.gov)  
Re: SMART 3.0  
To: The Department of Energy Resources  
Da: July 25, 2025

I am writing to express my concern and disappointment regarding the SMART 3.0 regulations, published and enacted as an emergency measure.

After months of hearings and public comments, your agency continues to force rate payers to destroy irreplaceable (in our lifetimes) natural resources by funding large scale solar in our forests and on our farmland.

I oppose funding solar that unnecessarily degrades our natural resources.

1. Massachusetts Audubon and the Harvest Forest (October 2023) published a study that showed that we could use already degraded resources and the built environment to fulfill the goals of the solar build-out in Massachusetts.

2. Anecdotally, a study conducted at UMass Amherst (May 2023) published the case of Northfield, MA that showed that in the built environment, including parking lots, and with a cursory extrapolation of the data, there is enough solar potential for every residential use in Northfield and in addition for 4,215 more homes in, for example, Boston.

3. The Healey Administration initiated the Climate Forestry Committee, and their report (January 2024) recommended to

“Reduce unnecessary forest land conversion via collaboration across state agencies and complementary policies, infrastructure investments, and other actions (e.g., solar facilities, powerlines, highways, housing, or other development).... Forest conversion on any given acre results in more carbon loss than harvesting on average, is more permanent, and also results in the loss of all other forest benefits.”

4. Regarding dual use solar, there is close to an inevitable loss of agricultural yields for many commonly grown crops under solar panels. Encouraging solar panels over food production on Massachusetts farmland is a foolhardy endeavor and should not be happening.

Notes are below and attached.

Regards,

Janet Sinclair  
71 Ashfield St.  
Shelburne Falls, MA

## NOTES

1. In a Massachusetts Audubon press release dated October 2, 2023, **"The current siting of large, ground-mount solar development poses a clear threat to vital forests and farmlands in Massachusetts.** But developing more solar energy to meet clean energy goals doesn't have to come at the expense of these critical habitats, according to Growing Solar, Protecting Nature, a new report released by Mass Audubon and Harvard Forest. By shifting from large-scale, ground-mount solar to solar projects on rooftops, parking lots, and already developed lands, Massachusetts can meet its goal of reaching net-zero greenhouse gas emissions by 2050 while simultaneously protecting crucial forests and farmlands. The report supports some ground mount solar but also highlights that projects are currently sited in a way that doesn't properly account for environmental impact. As a result, Massachusetts has lost more than 5,000 acres of forest and prime farmland since 2010." The full text of the study can be found here.

<https://storymaps.arcgis.com/stories/932be293f1af43c8b776fdad24d9f071>

2. The Massachusetts Clean Energy Extension, in a joint collaboration between the town of Northfield, UMass undergraduate students, and the UMass iCons program, published a study, "Solar Resources and Infrastructure Assessment", dated May 2023. It evaluated the solar potential for Northfield. Including roof tops, parking lots, farmland, forests, and the solar overlay district.

[https://www.northfieldma.gov/sites/g/files/vyhlif991f/uploads/04\\_solar\\_resource\\_and\\_infrastructure\\_assessment\\_johncarney\\_inst4.pdf](https://www.northfieldma.gov/sites/g/files/vyhlif991f/uploads/04_solar_resource_and_infrastructure_assessment_johncarney_inst4.pdf)

I calculated that given the number of residences in Northfield and the average size of solar installations needed for average residential electricity use, using very conservative estimates, Northfield can meet its own residential solar needs as well as put enough electricity on the grid to power 4,215 additional homes in, for example, Boston. This includes using Northfield's overlay district which is comprised as already degraded land.

3- The January, 2024 Climate Forestry Committee report recommends keeping forests as forests.

### ***"CFC recommendations to Reduce Forest Conversion and Increase Conservation:***

Reduce unnecessary forest land conversion via collaboration across state agencies and complementary policies, infrastructure investments, and other actions (e.g., solar facilities, powerlines, highways, housing, or other development).... Forest conversion on any given acre results in more carbon loss than harvesting on average, is more permanent, and also results in the loss of all other forest benefits." (page 48)

Keep Forests as Forests: The Committee unanimously agreed that maintaining forest cover is essential, recognizing that every acre of forest lost to conversion represents a

loss of stored carbon to the atmosphere as well as a loss of future carbon sequestration. The Committee strongly supported efforts to reduce land conversion, increase permanent land conservation, and enlarge forest reserves. ( page 5)  
<https://www.mass.gov/doc/forests-as-climate-solutions-climate-forestry-committee-report-final/download>

#### 4. UMass Clean Energy Extension

January 31, 2020 Reference: Comments on two ASTGU Pre-determination Applications Pine Meadow Road, Northfield, MA  
(page 42) ( attached.)

Crop Narrative Crop Choice and Dual-Use Compatibility - There is a significant risk that some of the chosen crops will not thrive, at least in the more heavily shaded areas. **Peppers, other mixed vegetables, and pumpkins are not known to do well under low light conditions, and could have greater than 50% reduction in yields in an average year and across the total paneled growing area. Only limited data on crop yield under shaded conditions is available – in 2017 and 2018, peppers grown under the UMass dual-use solar array saw a 30-60% and 75-80% decline in fresh fruit weight respectively.** Livestock grazing may be feasible, while there is no research that UMass Extension is aware of to indicate the likelihood of success for corn and small grains, nor was any evidence to support the yield assumptions provided by the applicant.

The applicant should consider what alternative crop choices are available in in subsequent years if the current choices are not adequately productive, and whether alternative crops will be compatible with overall farm production goals and marketable products. Response: N/A, updated agricultural plan solely incorporates livestock operations.