

From: [Elizabeth Fernandez O'Brien](#)
To: [SitingBoard Filing \(DPU\)](#)
Subject: SMART revisions
Date: Tuesday, April 22, 2025 7:11:23 AM

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Massachusetts Department of Energy Resources,
Thank you for your work to revise the SMART regulations for solar installation subsidies and for your commitment to ensuring that these regulations correct unintended harmful consequences of earlier versions of the SMART regs.

I urge you to consider the following requests for important improvements to these regulations. Only with these factors incorporated into the updated version can we be assured that appropriate solar projects will be developed and inappropriate projects will be prevented. I ask that you:

- 1) Not exempt all agriculture from the mitigation fee. Prime farmland is different than marginal farmland and should not be exempt.
- 2) Eliminate subsidies for all biomap land (both Core Habitat and Critical Natural Landscapes).
- 3) Ensure that state-assigned environmental monitors prioritize environmental concerns over industry concerns.
- 4) Include all land that is impacted and disturbed by projects as part for the project, not just the footprint of the solar arrays.
- 5) Pay mitigation fees at the beginning of the process, not after construction is underway.
- 6) Pay mitigation funds to the municipality/community where the development is occurring.

Thank you very much for your time and consideration of this important matter. Our municipalities and our forests are counting on you to uphold the possibility of a true clean energy future.

Sincerely,

Elizabeth Fernandez O'Brien

