

From: [Mass Audubon](#) on behalf of [Elizabeth Gifford](#)
To: [DOER SMART \(ENE\)](#)
Subject: SMART 3.0 Public Comment
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Jul 11, 2025

Department of Energy Resources
100 Cambridge St., Suite 900
Boston, MA 02114

Thank you for the opportunity to provide input on updates to the Solar Massachusetts Renewable Target (SMART) program.

The SMART program is essential for meeting our ambitious goals for clean energy and reducing greenhouse gas emissions. By providing targeted financial support for well-designed, responsibly sited solar projects, we can keep these 2030 and 2050 goals within reach.

As the state's recent modeling demonstrates, achieving our long-term goals for climate and biodiversity also requires us to protect forests and wetlands for their ability to remove carbon from the atmosphere, provide habitat for wildlife, and provide our citizens with clean drinking water, resilience to extreme weather, and access to outdoor recreation and healthy spaces.

I strongly support DOER's objectives to make program adjustments in SMART 3.0 so that going forward, project siting choices do not come at the expense of nature and the irreplaceable services it provides.

I endorse including and prioritizing environmental features including biodiversity, forest carbon, and ecological integrity as key criteria for measuring project impacts.

Working together with higher incentives to encourage solar on buildings, parking lots, and developed lands like landfills and brownfields, the scores assigned to these criteria should be high enough to deter solar development in areas of high conservation value. Scoring should also help deter further cumulative impacts to communities that have already been highly impacted by energy infrastructure.

In addition to establishing incentives and scores that encourage siting on developed and low-impact sites, mitigation fees should be assessed to compensate the public for any losses to ecosystem services, and these fees should be high enough to steer projects away from higher-impact sites.

Finally, I also support the emphasis on improving financial viability

for community solar projects that can help lower-income households and residents reduce their electricity bills.

Overall, I hope to see the SMART program make changes that prioritize new solar on our buildings, parking lots, and low-impact sites, and that avoid, minimize, and mitigate any impacts in our irreplaceable ecosystems, and for mitigation funds to be deployed quickly towards permanent protection of high-value conservation areas that are essential to our health and well-being, our economy, and climate.

Thank you for considering these comments.

Sincerely,

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