

July 25, 2025

**VIA ELECTRONIC FILING**

Director Samantha Meserve  
Massachusetts Department of Energy Resources  
100 Cambridge St., 9th Floor Boston, MA 02114

**SMART 3.0 Emergency Regulations – Lightstar Comments**

Dear Director Meserve:

Thank you for the opportunity to provide comments regarding the emergency regulations for the SMART 3.0 Program, as filed under 225 CMR 28.00. Lightstar applauds DOER for their support of solar development in Massachusetts as the industry faces headwinds as a result of the “One Big Beautiful Bill Act” passed by Congress and signed by President Trump earlier this month, which ends the Investment Tax Credit (ITC) for solar. While we await further guidance from the Department of Treasury, it is critical that Massachusetts act now to support cost-effective clean energy.

Lightstar develops, builds and operates community solar projects with a portfolio of more than 1200 megawatts (MW) of projects completed or in development across the country. Of that 1200 MW portfolio, 500 MWs are agrivoltaics. Lightstar is focused on community solar development that is built with ecological and agricultural needs at the forefront, which we believe is key to the next phase of securing energy independence, protecting valuable farmland, and meeting climate goals.

Lightstar would like to express its support for the comments submitted by the Coalition for Community Solar Access (CCSA) and BlueWave and highlight a few pieces of feedback to DOER, including:

**Ineligible Land – Wetland Resource Areas**

As noted by BlueWave in their comments, 225 CMR 28.09(1) identifies land use types that are ineligible for the SMART program, including: (a) Wetland Resource Areas, including Buffer Zones, as defined under 310 CMR 10.04.

Lightstar strongly urges DOER to include the phrase, “except as authorized by regulatory bodies” to 225 CMR 28.09(1)(a), which would make the language consistent with previous SMART regulations. Retaining this provision is essential to supporting dual-use projects, honoring approval from regulatory bodies, and preventing significant impacts to wetlands.

**Environmental Monitor**

Lightstar echoes the concerns of CCSA regarding the availability of Environmental Monitors considering the pressure to mobilize projects towards ITC eligibility. Additionally, we are concerned that the Environmental Monitor process does not account for potential recourse should there be a difference of opinion between the applicable parties. Lightstar also urges DOER to provide more detail and/or cost estimates regarding the Environmental Monitor fee.

Thank you for the opportunity to provide comments to DOER regarding the emergency regulations for the SMART 3.0 Program, as filed under 225 CMR 28.00. Lightstar looks forward to participating in SMART 3.0 and applauds DOER for its efforts supporting this solar in Massachusetts.

Sincerely,

Kelly Buchanan  
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