



**Community Solar Program Year One Lessons Learned Comments
Docket No. QO18060646**

Dear New Jersey Board of Public Utilities and Staff,

BlueWave Solar (BlueWave) is a community solar developer and services provider based in Boston, MA. We have developed 135 MW of community and public solar and are working on the forefront of dual-use development with New Jersey's farmers and landowners. We are excited to bring BlueWave's commitment to holistic development and community engagement to the residents, small businesses, public entities, municipalities, and farmers of New Jersey.

BlueWave is a member of the Coalition for Community Solar Access (CCSA) and is an active participant on the New Jersey Subcommittee. BlueWave firmly supports the comments filed by CCSA in docket No. QO18060646, regarding Year 1 of the Community Solar Pilot Program. Additionally, we submit these supplemental comments outlining the opportunity New Jersey has in embracing dual-use solar projects.

BlueWave sincerely thanks the Board of Public Utilities (BPU) for its collaboration in administering the Pilot Program and the opportunity to answer the questions outlined. We respectfully submit these comments for consideration by the BPU and look forward to working together to meet New Jersey's ambitious clean energy goals while at the same time prioritizing land preservation and farm viability.

Topic 2: Program Year 1 Application Form and Application Process

Application Process

BlueWave echoes the joint industry comments in calling for the application process to be digitized. If the BPU is concerned about creating a form that is entirely online and specialized, there is no need for the creation of an online portal. The application process can be as simple as allowing for the application to be made into a PDF and sent to a secure e-mail. In our experience, the compiling of the paper copy of the application was what took the longest in the entire process. This would also ensure the safety of BlueWave employees and BPU staff during this pandemic.

Preferred Siting for Dual-Use Agricultural and Horticultural Projects

In Section 2.3, specifically 2.3.1 and 2.3.3, of Governor Murphy's Energy Master Plan, community solar is identified as a preferred project type in order to create equity in the clean energy transition. With this in mind, the need for large scale community solar will become apparent as the Pilot Program progresses and the BPU turns toward designing the successor program. Community solar needs economies of scale for developers to facilitate these projects. If undeveloped land is needed for New Jersey to meet its clean energy goals, there must be careful consideration of where and how those projects are sited. Dual-use can alleviate

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concerns about solar siting while enabling the expansion of community solar benefits to the public.

Dual-use is a large-scale, ground-mount solar development approach focused on promoting agriculture within an array through designs, land management, and business strategies tailored for farming. Within a standard solar project, dual-use projects can mean sheep grazing over native pollinator fields or limited cultivation of crops between adequately spaced rows. Dual-use solar projects focus on enabling sufficient sunlight and the cultivation of a wide variety of crops, including vegetables, fruit such as cranberries, horticulture, and animals, by raising the panels to an adequate height and giving them appropriate orientation. In all cases, the land underneath the panels is kept in production, co-planned with farmers, and managed with a farming and farmland conservation ethos.

In many cases, dual-use solar can enhance land ecology through sustainable land management strategies rooted in philosophies that include but are not limited to: building healthy soils, promoting carbon sequestration, rotating crops, promoting cover crops, reducing tillage, facilitating sustainable grazing, enhancing species diversity, promoting water conservation, and improving upon input intensive industrial farming methods. These methods, otherwise known as regenerative farming, hold great promise for drawing CO₂ out of the atmosphere while building more resilient farms and rural communities.

According to a Rodale Institute review, regenerative agriculture systems (specifically, conventional crops and grazing) have the potential to sequester more than 100% of current CO₂ emissions globally, if these practices were adopted on a wide scale.¹ With far reaching benefits including improved soil carbon stocks, decreased greenhouse gas emissions, equal or greater yields over conventional agriculture, improved water retention and plant nutrient uptake, and improved farm profitability, regenerative agriculture can play a major role in revitalizing farm communities, improving biodiversity, and enhancing the resiliency of ecosystem services across New Jersey.

Dual-use can be a targeted post-COVID recovery tool for the agricultural community. With many family farms struggling to meet the demands of a new marketplace, a solar project that does not take land out of production can help stabilize a family enterprise for the next generation. Stable solar revenue can jump start the agricultural economy and be an incubator for new and innovative farming business models. Because of the economic uncertainty of COVID, more than ever, farms in New Jersey are at risk for conversion to permanent forms of development like housing or strip malls.

Dual-use solar is an economic development tool not just for farmers, but for municipalities as well. Developers are committed to paying property taxes on behalf of the farmers or landowners for the life of the dual-use project. If the project is also built as a community solar project, towns

¹ “Rodale Institute: Regenerative Organic Agriculture and Climate Change – A Down-To-Earth Solution to Global Warming” (2014) - <https://rodaleinstitute.org/wp-content/uploads/rodale-white-paper.pdf>

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often have the chance to be anchor customers and realize energy savings on behalf of their residents.

As projects currently receive zero points for siting on farmland or previously undeveloped land, we urge the BPU to consider projects that allow for new or continued agriculture or horticulture in and around the arrays preferred sites. The BPU could award points for projects that demonstrate the continued agricultural use of the land through maintaining their farmland assessment status. This process already exists for farms to maintain their farmland tax status and the appropriate agencies can utilize this assessment to verify agricultural activity for dual-use projects instead of creating an additional process.

We want to commend the BPU for a thoughtful and engaging stakeholder process on the Community Solar Pilot Program as well as an open and transparent conversation about the future of the permanent program. If the staff has any additional questions about dual-use solar please reach out.

Sincerely,

Lucy Bullock-Sieger
Director of Civic Engagement