

**COMMENTS FROM KNOWLTON TOWNSHIP AGRICULTURAL  
ADVISORY COMMITTEE**  
on the New Jersey 2019/2020 Solar Transition Solar Successor Program:  
Staff Straw Proposal

The Knowlton Township Agricultural Advisory Committee hereby submits the following comments on State of New Jersey, Board of Public Utilities (BPU) April 26, 2021 Solar Successor Program: Staff Straw Proposal

**Effect of the BPU Proposal on Farmland Preservation Program**

The New Jersey farmland preservation program is one the most successful farmland preservation programs in the country and has wide support among the citizens of New Jersey who have repeatedly approved referendums for funding the preservation of what remains of New Jersey's farmlands.

The BPU plan however, would subsidize solar development on non-prime farmland which could result in rendering agriculturally unproductive approximately 145,000 acres of land targeted for preservation by the SADC. The BPU plan is in huge conflict with the SADC's plan to preserve our remaining farmland.

The classification of soils into prime and non-prime was done decades ago and was based primarily on soil types. With today's agriculture techniques non-prime land can be equally as productive as prime land. From an agriculture use viewpoint this division of soil types is arbitrary and therefore for the BPU to target non-prime farmland for solar development is also arbitrary. In fact, one of the most productive farmers in the State farms on largely non-prime farmland located in Knowlton Township. It is arbitrary to target removal of non-prime farmlands from agriculture use.

Knowlton Township, like many rural townships, has for decades recognized the economic and cultural importance of its farming community in its Master Plan. The Township has, through the SADC's Municipal Planning Incentive Grant program, targeted for preservation many of its unpreserved farms, most of which are on land not designated as prime by the State. The BPU plan will not only undermine one of the main goals of the Township but is in direct conflict with the State's policy to preserve farmland both on prime and non-prime soils.

It is unconscionable that the State would subsidize the destruction of farmland targeted for preservation in direct opposition to the State's policy, supported by referendums, to protect farmland.

We recommend that any farmland on a county or municipality target farm list, regardless of whether it has prime soils or not, be ineligible for state-subsidized solar development.

In addition, we recommend that the waiver provision be either eliminated or greatly reduced. It will be very difficult to create a waiver process that will be perceived by the public to be equitable and fair. It is inevitable that charges of favoritism and corruption will occur when waivers are granted which will diminish the reputation of the program in the eyes of the public. If a waiver system is kept as part of the program the percentage of farmland land allowed to be waived should be decreased to 1% of the eligible farmland in a county's ADA.

## **Solar Development vs Agricultural Production**

Our species faces a number of critical challenges besides global warming. The UN forecasts that the world population will increase by 25% or 1.9 billion people in next 30 years. Producing food to feed this growing population is also a critical challenge. The BPU cites no source for the assertion that fighting global warming is more important than increasing food production in order to feed an increasing population. There is no consensus regarding which of these problems is the more serious. Both are critical. Both must be solved.

The BPU however, seems to have determined that one of these threats is so much more serious than the other that it is acceptable to fight one at the expense of the other. This makes no sense and is not a policy determined by rational analysis. It is an arbitrary policy.

Agrivoltaics the dual use of solar development and agriculture, is often mentioned as a way for agricultural production and solar development to coexist on the same land. But agrivoltaics is an unproven, fanciful concept that can only work in limited niche situations and should not figure in any analysis of solar development. It cannot be expected to compensate for the loss of agricultural production on land covered with solar panels.

## **Solar Panels in Developed Areas**

The Governor has declared that a significant portion of our electricity generation should come from solar. But it is foolish, shortsighted and unnecessary to try to solve one critical problem (global warming) by exacerbating another critical problem (shortage of farmland). Considering the vast potential in New Jersey, the most densely populated state in the country, for building solar installations on developed land, the BPU plan should be directed at building solar panels on developed land such as parking lots and the roofs of commercial and industrial buildings. It is on these structures that solar should be built, especially, in the early stages of the solar program. If the proper incentives are given to site solar on developed land it may turn out there is no need for siting solar on farmland.

## **Issues Not Addressed by the BPU Straw Proposal**

### **1: The Highland and Pinelands**

The siting criteria prohibits giving incentives for solar development in two broad areas of the State, the Highlands Preservation Area and the Pinelands.

However, it is not clear why these areas are the only two categories of land in the Policy Map of the State Development and Redevelopment Plan in which solar development is not encouraged. The lands in the Rural/Environmentally Sensitive and Environmentally Sensitive Planning Areas are every bit as environmentally important as those in the Highlands and the Pinelands. No explanation of the logic behind this inconsistency is given. Solar development should not be subsidized in these environmentally important planning areas

### **2: Effect on New Jersey's agriculture industry.**

Siting solar on non-prime farmland will harm existing farmers. For example, many, if not most, large farmers farm on rented land as well as on land they own. If the rented land is taken out of production it could significantly harm the farmers who rely on it. The BPU Straw Proposal does not appear to address this subject. The BPU should study the effect of its proposal on the agricultural industry in New Jersey.

### 3: Tax Effect on Working Class Citizens

Solar panel developers receive significant tax breaks such as federal tax credits and state tax breaks. If one group (the solar developers in this case) gets a tax break it is not uncommon for the rest of the taxpayers to see increased taxes. The BPU Straw Proposal does not appear to address this subject.

### 4: Effect of Increased Electricity Costs

28,000 MW's of solar production will significantly increase the cost of electricity to New Jersey residents, farmers and industries. This is a deterrent to increased use of environmentally friendly electric propulsion for vehicles, environmentally friendly heat pumps for heating. and production costs for farming and industry. Increased electric costs disproportionately affect the economically disadvantaged and the working class. The BPU Straw Proposal does not appear to address this subject.

The Knowlton Township Agricultural Advisory Committee  
May 25, 2021