



Solar Agricultural Services, Inc.

PO Box 41, West Wareham, MA 02576

www.solaragservices.com | 774-332-6227

December 13th, 2023

Sherri L. Golden
Secretary of the Board
44 South Clinton Avenue
Trenton, NJ 08625-0350

Dear Ms. Golden,

Solar Agricultural Services (SolAg) plays the role of facilitating communication between farmers and solar developers, focusing on bridging the gap between these two groups and supporting the implementation of Agrivoltaic projects across the United States. Committed to ensuring that the concerns and perspectives of farmers are effectively communicated and carefully considered in the decision-making process, SolAg strives to foster a harmonious relationship between the two parties. Uniquely positioned as practitioners, we have been involved in most of the agrivoltaic projects in Massachusetts over the past 3+ years of their SMART program. Our experience has allowed us to engage with various stakeholders, including landowners/farmers, tenant farmers, academic institutions, and local and federal governing bodies. We know firsthand that farmers are often tasked with fulfilling promises and meeting expectations set by non-farmers, while trying to adapt to new farming methods that differ from what they, or their parents and grandparents, were accustomed to and that these don't always serve the best long-term interests of the farm.

We would like to commend the State of New Jersey, the Board of Public Utilities and Rutgers University for taking the lead on shaping agrivoltaic policy on a national level. While there are still many unknowns surrounding agrivoltaics, what is known is that farmland and the farmers that farm that land are in decline, while our population and demand for food is increasing. Our view is that agrivoltaics marries our appetite for renewable energy and carbon neutrality with our literal appetite and serves as a farmland revitalization technique. The existing Straw Proposal is a significant first step towards equitably satisfying these appetites. It is with humility that we are offering up our perspectives and those of the New Jersey farmers we are working with on potential tweaks to the proposal for you to consider.

Consideration #1: Study Area

The lack of clarity regarding the location requirements for the study area in agrivoltaic projects, particularly the fencing requirements (Appendix C, Paragraph 3), raises concerns as it may create challenges for farmers, especially smaller, land-constrained farmers facing financial and logistical constraints. Therefore, it is important to clarify the study requirements, while acknowledging that it is impractical and not expected to recreate exact base conditions of the control area. For instance, artificial compaction and decompaction of soil to mimic array construction conditions would be costly to the farmer and is likely not necessary. Additionally, it is important to design an experiment in collaboration with the farmer. This may entail limiting the areas specifically impacted by the experiment, offering additional compensation for the farmers time and potential loss of markets due to the need to limit research variables.



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Consideration #2: Historically Farmed Wetlands

Many farms across New Jersey have areas of prime farmland or soils of statewide importance that also have wetland inclusions or higher water tables indicated by redoximorphic features mixed in with historically farmed areas. While in full agreement that protection of wetlands and wetland function is paramount, consideration could be given to allowing agrivoltaic installation on historically farmed wetlands. During this pilot program additional research could be conducted to determine whether there is any adverse impact on the wetland and agricultural function of these soils due to the presence of solar panels. This approach could reduce incongruent solar arrays and fences that bisect fields and make continued farming more difficult.

Consideration #3: Soil Conservation

Reference is made to conservation plans in Section 3, paragraphs C-e of the Straw Proposal. This would be an ideal addition to an agrivoltaic project. However, it is worth considering not requiring a certified Natural Resource Conservation Plan simply because the agency already has capacity constraints related to accommodating EQIP and other USDA programs. That said, consideration could also be given to encouraging or improving the ranking of agrivoltaic projects that integrate regenerative soil building practices into their agricultural plan.

Consideration #4: Farmer Impact

Farmers, entrusting solar developers with access to their land for agrivoltaics, already face challenges contemplating how to accommodate different-sized equipment and altered farming practices. A requirement to commit to reporting on the amendments they are applying, the planting practices they are conducting, and the crops they are producing has been palatable to the NJ farmers we are working with. The caveat to this is that they are requesting financial assistance and administrative assistance to do so. However, potentially being required to comply with a minimum of 3 years of yet undetermined research, that may potentially obligate them to publicly disclose economic and/or socioeconomic information, is a significant source of unease. Consideration could be given to acknowledging in the pilot program that sensitive economic and/or socioeconomic information obtained through research studies would remain confidential and not be directly attributable to a particular farm/farmer.

In summary, agrivoltaics offers a significant opportunity for all involved and the existing Straw Proposal goes a long way to helping make this a reality. This agrivoltaic initiative provides structure to maintain balance between the needs of solar developers, researchers, and utilities with the needs of farmers. Working collectively, our agrivoltaic policy will empower rather than overwhelm those who feed our communities.

Sincerely,

Iain Ward, CEO

Solar Agricultural Services, Inc. (SolAg)