



**Solar Agricultural Services, Inc.**

PO Box 41, West Wareham, MA 02576

[www.solaragservices.com](http://www.solaragservices.com) | 774-678-2010

June 24th, 2024

Sherri L. Golden  
Secretary of the Board  
44 South Clinton Avenue, 1<sup>st</sup> Floor  
P.O. Box 350  
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 considering and incorporating many of the stakeholder suggestions made during the previous draft straw proposal of prequalification submissions. This revised straw proposal goes a long way to protecting the agricultural integrity of land and those farming it while furthering the appetite for renewable energy. It is with humility that we are offering up our perspectives and those of the New Jersey farmers on potential further minor tweaks or clarifications.

#### **14:8-13.6 Project Siting Requirements**

Consideration could be given to clarifying that tree clearing associated with normal maintenance and improvement of land in agricultural use, that is conducted in accordance with NRCS Practice Standards and Specifications, is not subject to paragraphs #4 or #6.

#### **14:8-13.5 Pilot Program Eligibility**

In paragraph (c), consideration could be given to their not being a minimum capacity limit to allow for farmer owned projects that can typically be less than 500kv. This could provide small and beginning farmers on small parcels closer to urban areas with equal access to this program, increasing diversity of farmers, crops and local.



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#### **14:8-13.9 Installation, Construction and Operational Requirements**

##### **Pilot Program Eligibility**

In paragraph (e) 5 ii, consideration could be given to not requiring projects less than or equal to 3.0 acres as having a research control area equal in size (100%) to the entire area of the array. Consistent with the same rationale for small projects as described above in par (c), perhaps a smaller portion of the solar array area could be used (like 50% as was listed in the original straw proposal).

##### **14:8-13.10 Monitoring and Research Requirements**

Consideration could be given to acknowledging that farmer compliance with research and reporting may be burdensome on farmers and could be accommodated through additional farmer compensation.

In summary, agrivoltaics offers a significant opportunity for all involved and this revised 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)