

**Environmental Defense Fund – New Jersey Audubon – The Nature Conservancy
New Jersey Conservation Foundation – NJ Highlands Coalition – NJ League of
Conservation Voters – Pinelands Preservation Alliance**

July 31, 2018

Aida Camacho, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314, CN 350
Trenton, NJ 08625

Dear Secretary Camacho:

The undersigned conservation organizations are writing to share our views regarding the establishment of a community solar pilot program (docket number QO18060646). We support the continued growth of solar energy as a clean source of electric generation, and implementation of the Community Solar Energy Pilot Program to ensure that there is more equitable access to solar energy for residents and communities that have not enjoyed the benefits of solar energy, including multi-residential dwellings and low and moderate income communities.

We would like to focus our comments on appropriate siting for community solar projects to avoid impacts to open space, sensitive environmental resources and important agricultural lands. We support a continued prohibition for solar energy development on preserved lands, except as currently allowed for personal use. In general, we support the findings of the NJ Department of Environmental Protection's Solar Siting Analysis 2017 Update, which identified "Preferred" locations for solar as areas with existing impervious coverage that are generally urban, commercial or residential areas. Brownfields, landfills and rooftops are the preferred locations for solar development as they avoid impacts to open lands. However, we recognize that incentives and/or policy changes may be needed to make these locations more desirable or feasible for solar developers, and we support the development of such incentives.

NJ DEP's Solar Siting Analysis 2017 Update identified "Non-Preferred" locations as including forests, wetlands and agricultural lands. We generally agree, and have identified a list of environmentally sensitive areas that should be excluded below:

- . Preserved open space & other parkland
- . Preserved farmland
- . Waterbodies and regulated buffers
- . Natural Heritage Priority Sites
- . Habitat for federal and state Endangered, Threatened & species of special concern
- . Regulated freshwater and coastal wetlands and their buffers
- . Upland forest
- . Floodplains (100 year flood)

- Lands that are priorities for farmland and open space preservation

In the New Jersey Highlands Region, community solar should be prohibited in:

1. The Preservation Area delineated in the Highlands Act, except in Highlands/DEP approved Redevelopment Areas;
2. The Protection Zone delineated by the Highlands Council in the Highlands Regional Master Plan (RMP);
3. The Environmentally Constrained Conservation Zone, delineated in the RMP;
4. The Conservation Priority Area delineated in the RMP;
5. The Agricultural Resource Area delineated in the RMP; and
6. The Environmentally Constrained Existing Community Zone delineated in the RMP.

In order to achieve solar goals and reduce costs, it may be necessary and appropriate to consider some development of community solar projects on sites that fall outside of NJ DEP's "Preferred" locations. "Non-Preferred" locations should be avoided to prevent damage to critical environmental or agricultural resources. However, it may be possible to identify a limited category of marginal, undeveloped lands that are not environmentally sensitive, nor identified priorities for land preservation, that may be suitable for community solar projects, as determined on a site-by-site basis.

We look forward to working with the Board of Public Utilities and other stakeholders to develop an effective Community Solar Energy Pilot Program that will bring the benefits of clean, solar energy to more residents and communities, and that is appropriately sited to protect the state's critical environmental and agricultural resources.

Sincerely,

Mary Barber
Director, Strategic Alignment and Performance, State Implementation
Director, New Jersey Clean Energy
Environmental Defense Fund

Alison Mitchell, Policy Director
New Jersey Conservation Foundation

Kelly Mooij, Vice President of Government Relations
New Jersey Audubon

Ed Potosnak, Executive Director
NJ League of Conservation Voters

Jaclyn Rhoads
Assistant Executive Director
Pinelands Preservation Alliance

Julia Somers
Executive Director
NJ Highlands Coalition

Tom Wells
NJ Government Relations Director
The Nature Conservancy