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BECAUSE AGRICULTURE MATTERS!

To: Aida Camacho, Secretary  
NJ BPU  
44 South Clinton Ave  
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Trenton, NJ 08625  
[Rule.Comments@bpu.nj.gov](mailto:Rule.Comments@bpu.nj.gov)

From: Ryck Suydam, NJFB President

Date: 31 July 2018

Subject: Community Solar Energy Pilot Program Rulemaking

New Jersey Farm Bureau is a grassroots, membership supported organization, providing assistance and resources for over 9,000 farm families and agribusinesses in the state of New Jersey. We are the largest advocate for agriculture in the state and have paid close attention over the years to the development of solar energy.

We find the NJ DEP Solar Siting Analysis Update of December 2017 too prescriptive in terms of allowable agricultural lands to be made available for community solar development. All agricultural/cropland (2100) is considered not-preferred lands, which we disagree with. NJFB would like to allow consideration of a wide diversity of agricultural land possibilities without jeopardizing land resources.

If the purpose is to provide universal access to solar, it is going to take a variety of land uses to fulfill the pilot goal of 450 megawatts over three years. In addition to utilizing brownfields, rooftops and landfills, which can be costly and complicated at times, we advocate for the inclusion of marginal agricultural lands, to promote both farm viability and land stewardship.

The State Agricultural Development Committee (SADC) leads in the preservation of New Jersey's farmland and promotes innovative approaches to maintaining the viability of agriculture. As the state's prime evaluator of farmland deemed worthy for preservation, we recommend they be consulted as the guidelines for siting are developed.

We look forward to further consultation with the NJ BPU and SADC regarding the inclusion of agricultural lands in the NJ Community Solar Energy Pilot Program.

Thank you for the opportunity to comment on this important endeavor.

CC: Douglas Fisher, Secretary of Agriculture; and  
Susan Payne, SADC

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