



Comments on Solar Siting Element of Energy Master Plan

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New Jersey Future submits the following comments on Strategy 2 of the draft Energy Master Plan, “Accelerate Deployment of Renewable Energy and Distributed Energy Resources.” Our comments specifically pertain to the siting of solar power facilities.

We agree with the direction of Goal 2.1.8, “Coordinate permitting and siting processes,” but believe the language can make this goal more effective by including the following recommendations:

- Locate solar facilities in already-developed areas, so as to put the power source close to where the power will be used and minimize losses during transmission.
- Prioritize the placement of solar panels on land parcels that are already covered with impervious surfaces, particularly on rooftops (especially of flat-roofed industrial buildings) and on solar canopies above surface parking lots, and de-emphasize placing them on undeveloped land. Total impervious surfaces (including rooftops, surface parking lots and access roads) in New Jersey are estimated at 6.8 billion square feet, providing ample space for solar installations.
- In general, give priority to rooftop installations over ground-mounted projects, to minimize impact on land consumption.
- Specifically, ensure that financial incentives for solar facilities on rooftops and parking lots are more attractive than those offered on undeveloped and open lands.
- Give priority to solar installations on brownfields, including closed landfills, until such time as a higher and better use for these lands is proposed.
- Do not promote the installation of utility-scale solar installations on preserved farmland or open space. This is not “preservation” as advertised when voters approved the funds for preserving these lands. Ground-mounted solar facilities are, from a land-use perspective, power-generating facilities and should be treated as a specific land use category (though less polluting than traditional power plants, they are still power plants), not as open space.

Additionally, flood zones should not be completely discounted as potential sites for solar installations as accommodations can be made to the installation to protect it from rising water. These areas oftentimes have limited alternative uses and thus provide increased space for solar installation without resorting to ground-mounted solar on useable open space.

We also support the encouragement and development of community solar projects, as described in Goal 2.3.1 and 2.3.3. These smaller-scale solar installations to which customers can subscribe will be particularly beneficial to people who rent, including those living in apartment buildings, and residents and businesses in urban areas. Contaminated sites, flat-roof commercial buildings and surface parking lots can all support such installations. These non-ground options are especially important in walkable neighborhoods where ground-mounted solar installations can take up valuable space and detract from the livability and vitality of the area.

Expanding solar energy generation is crucial to meeting New Jersey's clean energy goals. New Jersey Future supports responsible measures to expand solar while maintaining our state's open spaces.