

## **SAMPSON FARMS**

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October 28, 2016

Mr. Michael Judge, Director of Renewable Energy  
Massachusetts Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Dear Mr. Judge:

Thank you for the opportunity to comment on the Department of Energy Resources' Next Generation Solar Incentive Straw Proposal ("Proposal"), which was presented to the public on September 23, 2016. The Proposal is a good step in continuing to provide the citizens of Massachusetts with access to the economic and environmental benefits that solar photovoltaics (PV) provide. However, the siting criteria proposed, is unnecessarily prohibitive as it relates to agricultural land and challenges we face as local farmers.

As a Massachusetts farmer in Westport, I have committed my land and my livelihood to principally growing potatoes. During the summer months we operate a Farm Stand and participate in local Farmers Markets in which we sell fresh corn, onions and other vegetables to help with the cash flow challenges of farming. The Sampson Farm has been in our family since 1850 and we consider our farm to be a valuable resource to the community. We pride ourselves on being good stewards of the land, cultivating it to be as productive as possible, always mindful of its overall agricultural value. Farming is a tough business requiring hard work, ingenuity and economic stress. We (along with our relatives before us) are committed to farming. It makes sense to us that the land that isn't used or is non-productive for various reasons, is appropriately protected or used in support of our farming activities. For us, siting solar PV on part of our land will help generate revenue and enable us to keep farming. In addition to growing potatoes and our vegetables for the local markets, we welcome the opportunity to participate in producing electricity that reduces greenhouse gases and saves people money.

If the siting criteria were to remain as it is currently proposed, it would prohibit the development of ground mounted solar from qualifying for solar incentives on land designated as Prime Farmland Soils. That means farmers like me might lose our property, eliminating an active farm that could then be developed as residential or commercial buildings. We are contacted regularly by developers wanting to convert our farmlands to house lots or commercial use. In the past my parents and uncle who operated the farm before me were required to sell house lots to preserve the farm.

In order to address any concerns that exist regarding the development of solar PV on Prime Farmland Soils, thoughtful guidance that promotes the dual use of agriculture and solar PV generation should be established with input from the farming community and the Department of Agricultural Resources ("DAR"), as opposed to a complete prohibition as currently proposed.

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Establishing criteria that defines dual use and which includes consultation with DAR is a balanced approach that will ensure only those projects that ultimately support the agricultural activities of the property to be developed, should proceed. This guidance could also contain a provision that encourages solar developers to consider long-term soils preservation in their development project plans and manage their projects accordingly.

Today, over 500,000 acres of land are actively farmed in Massachusetts. It is estimated that the new incentive program will enable 1,600 MW of new solar PV, which represents approximately 8,000 acres of land that will be developed. Presuming 1600 MW DC in the new program are ground mounted solar, this would be 1.5% of the total acres of actively farmed land in Massachusetts today. This in and of itself is an appropriate management plan and does not justify a complete prohibition. Moreover, solar PV facilities typically have an expected life-span of 20-30 years. A solar PV facility developed on agricultural land is therefore temporary and the land can be returned to agricultural use or open space once the facility is decommissioned and removed. It is also important to note that for the 20-30 year period solar PV remains on agricultural land, its impact on soil conditions is light when compared to pesticides and nutrients used in agriculture activities.

Massachusetts is a national leader in land preservation, agricultural management and clean energy production. Ensuring that the solar incentive program continues to support these activities in tandem with each other is important for us all.

Thank you for your time and attention to these comments. Any consideration you may afford us in this matter is greatly appreciated. I respectfully invite you and your staff you to visit our farm to gain first-hand knowledge of what is at stake here.

Thanks,



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