

December 28, 2020

Jason Pezzullo, Planning Director Cranston City Hall 869 Park Avenue Cranston, Rhode Island 02910

RE: Natick Avenue Solar Development Cranston, Rhode Island

Dear Mr. Pezzullo:

On behalf of the applicant, Natick Solar, LLC, we respectfully submit this project narrative with our Preliminary Submission per Section III (J)(3)(d)(7) of the City of Cranston Subdivision Regulations. The site is located west of Natick Avenue and has an existing drive that provides access to the property. The owner of the property is Ronald Rossi (Assessor's Plat 22-3 Lots 108 and 119). The site has a total area of approximately 64 Acres and is zoned A-80.

This project received Master Plan approval from the Planning Commission on February 5, 2019. Since that time the developer and its consultants have been working with various local and state agencies to comply with the Master Plan approval conditions. This project is grandfathered under existing ordinances and regulations in effect at the time of the vesting of the application.

Since then, the City Council has revised Cranston's solar ordinances and major solar projects are not permitted as a matter of right in A-80 zones like the subject property. In January, 2020 the City Council adopted new solar performance standards for solar projects in the city. Ordinance Number 2020-2 and its requirements are not applicable to this preliminary application.

The proposed development is for an 8.1 megawatt DC solar farm that meets the Solar Power Performance Standards as set forth in the City of Cranston Zoning regulations Section 17.24.020 in effect at the time of the Master Plan approval. The solar farm will utilize approximately 23.3 acres of upland areas and clearing of natural vegetation will be limited to what is necessary for the construction and operation of the solar power facility. The proposed grading has been minimized to the maximum extent practical for the installation of the solar system. The areas to be graded include the areas of steep slopes and the areas where drainage and access roadways are to be installed. The areas of development will be located outside all of the jurisdictional wetland areas including the buffer areas. An existing gas line easement runs along the southern boundary of the site and the applicant is not proposing any solar development within this area. The landscape architect has prepared a landscape plan which addresses all the buffering concerns of the surrounding area and this plan has been reviewed with the advisory

committee formed in accordance with the Master Plan approval. The landscape plan was also reviewed and approved by the Conservation Commission. The interconnection for the project will require improvements to utility infrastructure along Natick Avenue and Wilbur Avenue with a small upgrade near the intersection of Phenix Ave and Olney Arnold Road. A RIDEM Wetlands Preliminary Determination permit has been received from RIDEM and the design meets the requirements as set forth in the RI Stormwater Design and Installation Standards Manual. In summary, the development has received Master Plan Approval, RIDEM Approval, Conservation Commission Review (11-24-20), Development Plan Review Committee Approval (11-19-20), and now seeks Preliminary Approval from the Planning Commission. Below are the conditions of approval set forth at the Master Plan approval stage and how the applicant has addressed each condition.

Master Plan Conditions of Approval

1. The applicant shall use an inclusive approach with the direct abutters to develop an effective buffering plan. The applicant will demonstrate that they have considered the abutter's request for buffer widths, both the understory and canopy so as to appear naturalized, focus on native species and include a mix of maturities, coniferous and deciduous species.

The applicant met this condition of approval with their joint effort with the advisory committee formed with area residents and the peer review landscape architect hired by the city at the Developer's expense.

2. The applicants shall submit the Buffer Planting Plan to the Conservation Commission for review and comments as part of the Preliminary Plan process. Required changes to the Buffering Planting Plan (including buffer widths) may result in alterations to the current proposed layout of the solar installations. The widths of the buffers will be required to be as wide as necessary to effectively screen the solar panels and equipment. Required widths may vary depending on topography or other site conditions.

The applicant met with the Conservation Commission on November 24, 2020 and received a favorable review of the submitted landscaping plans.

3. Under the provisions of the City of Cranston's Subdivision Regulations Section III (C)(9), a professional landscape architect will be hired by the City to conduct an independent peer review on any and all buffer plans proposed. As part of its independent review, the Commission's landscape architect seek input and information from an Advisory Committee composed of the developer's representative, a Planning Department representative, a Commissioner appointed by the Chair of the Plan Commission; and two representatives of the neighborhood- one of which should be an abutting property owner. The Advisory Committee shall follow the intent of Condition of Approval #1.

The applicant met this condition of approval with their joint effort with the advisory committee which reviewed the landscaping plans over several meetings. This included the efforts of the City Planning Department, the applicant and consultant team, the advisory committee and Sara Bradford, the professional landscape architect hired by the City. Ms. Bradford provided recommendations and the applicants professional landscape architect John Carter has included these within their latest

Landscape Plan. Below is a list provided by John Carter, which describes any of the divergences from the recommendations:

- We fully comply with 'C' Typical Plant Group Materials and Total Numbers of Plants.
- In 'D' Amended typical Group Pattern we comply, in D Amended Total Plants for Area of Planting, Ms. Bradford suggested 6 total groups and we proposed 3, the difference being 114 plants suggested and 57 proposed. The reason is that there is significant vegetation between Natick Avenue and the proposed panels.
- In Ms. Bradford's "West End of C" edge of clearing she suggested 26 White Pines at 7-8' and we are proposing 16 Green Giant Arborvitae at 3-5' height. These plantings are intended to screen the homes on Ridgewood Drive in the event that Ron Rossi cuts down the trees on his property. He has no intention of doing that so there is no reason to plant 7-8' trees now, the trees as proposed will mature and create an evergreen screen over time.
- The last divergence is a suggestion to plant more trees along the eastern edge of the service road near the gas easement to screen the view from Natick Avenue. For the same reason in 'D' above, there is substantial vegetation between Natick Avenue and the proposed solar field this time of year as shown in the attached photos during the winter conditions with no leaves on the trees. Photographs and additional detail has been provided in this letter.
- 4. The applicants shall receive Preliminary DPRC approval prior to submission of a Preliminary Application with the Planning Department.

The applicant has received Preliminary DPRC approval on November 18, 2020.

5. The applicant will work with the Tennessee Gas Pipeline to (TGP) to ensure that the project will be consistent with the terms and conditions of the easement.

The applicant has met with the representatives of the Tennessee Gas Pipeline on site to go over the proposed development. Notes have been added to the plans based on the meeting with Tennessee Gas and additional coordination including a pre-construction meeting will be required prior to any construction on site.

- 6. The Preliminary Plan site plan shall provide the dimension of the curb opening on Natick Avenue. **This dimension is shown on Sheet 4.**
- 7. The development shall follow existing grades as much as possible, where changes are required, they shall be kept as minimal as possible. In the event of ledge or rock, removal of such shall be mechanical as much as possible.

The proposed grades on site are proposed to be kept as minimal as possible.

8. Storm water management shall follow existing topography and utilize R.I.D.E.M. Best Maintenance Practices (BMP's) to ensure conformance to City code. Said plan shall attempt to enhance any conditions (existing and proposed) at, to or near adjacent wetlands and Natick

Avenue.

The applicant has received RIDEM approval.

9. As discussed at the DPR pre-application meeting, any transmission lines and/or utility pole relocations within the Natick Avenue Right-of-Way are carefully coordinated with the appropriate utilities.

The applicant is continuously working with National Grid in regards to this condition.

10. The applicant will demonstrate that they have considered testing of wells of direct abutters (with their permission) prior to any blasting activities and the blasting company (if utilized) will follow the customary procedures for pre-blasting inspections of surrounding properties.

Any blasting on site will follow all local and state requirements. Further consideration of testing will be made as more detailed information and determinations are made as to the scope of any blasting.

11. Seed mix to be used under panels shall be organically sourced (non GMO or otherwise enhanced seeds) and consist of local seed varieties that would be found in NE meadows.

The landscape architect has included a seed mix that meets this criteria.

12. Control of growth under the panels must be limited to mechanical methods. No herbicides or other chemical means may be used to control growth under the panels.

The applicant is proposing to control all growth under the panels with mechanical methods.

13. During the Development Plan Review phase, the applicant will work with the Planning Department to explore the feasibility of the proposed walking trail as offered in SSRE's letter to Jason Pezzullo, dated January 23, 2019, signed by Robert D. Murray of Taft & MeSally, LLP (February Staff Memo Exhibit K).

The applicant and the planning department have discussed not pursuing this matter at this time. The applicant may consider re-visiting this issue in the future.

Access to the proposed development will be from the existing driveway located off of Natick Avenue. The applicant is proposing a gravel roadway to provide safe access for construction, maintenance, and fire/emergency safety vehicles. The development area will be enclosed by a security fence and signage will only be located on this fence. There is no signage proposed along Natick Avenue. There will be a gated entrance which will be locked and the Cranston Fire Department will be provided a key to access the site. The lighting of the site will be limited for safety and operation requirements only. The proposed solar farm will not require any maintenance from the City of Cranston and will be privately maintained.

If you have any further questions on this matter, please feel free to contact me at your earliest convenience.

Sincerely,

DiPrete Engineering Associates, Inc.

David A. Russo, P.E.

Senior Project Manager

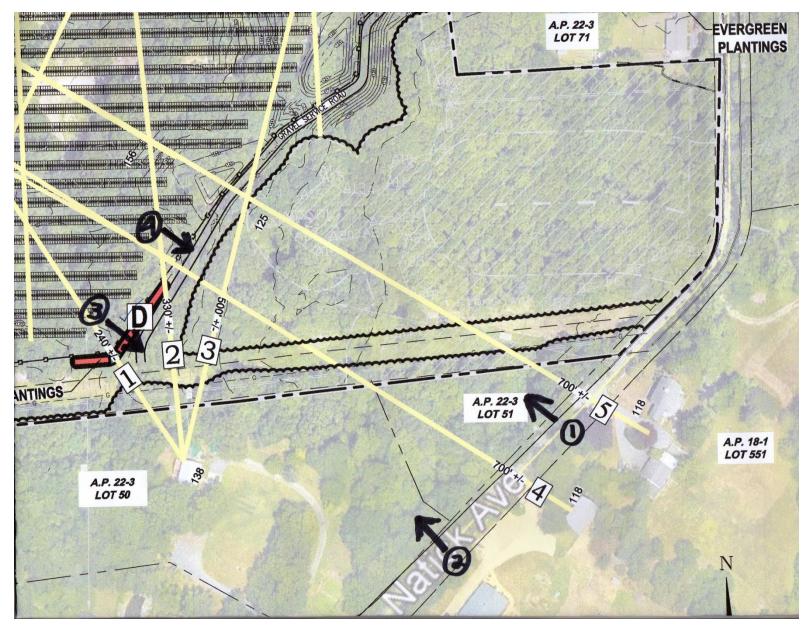


Photo Locations



1. View from Natick Avenue

December 3, 2020



2. View from Natick Avenue

December 3, 2020



3. Looking toward Natick Avenue

December 3, 2020



4. Looking toward Natick Avenue

December 3, 2020