

2021 February 22

Cranston Planning Commission  
869 Park Avenue  
Cranston, RI 02921

Dear Commissioners,

The Commission should reject the latest changes to the landscape plan's area F proposed by the applicant in their letter of 2021 February 2 and accepted by staff in their memo of 2021 February 23. The new condition 6 is wholly inadequate to provide any buffer for abutters to the southeast as recognized by the Commission's landscape architect in her letter of 2021 January 18. "...[T]he proposed planting along the fence seems to have minimal initial or long term buffer value." How does the use of area D plantings change that determination?

What is the applicant's objection to planting east of the proposed road? The proposed changes should have been discussed with the abutters' representatives to the Advisory Committee.

The drawings provided by the applicant are inadequate and do not provide the Commission or the abutters enough information to judge the proposed changes. Area F is located south of basin B as shown on the DEM plans and the latest plans from the applicant. A comparison of the plans reveals changes to the elevations, particularly 144 feet. The horseshoe design of the 144 foot elevation line is obviously wider on the new plans plus the applicant has added a road to the plans.

Is DEM aware of these changes? Has the applicant notified DEM of the changes? Remember the applicant has a history of not notifying DEM of changes as discussed in DEM's 2018 February 22 letter of non-compliance issued for the Lippitt Ave solar project. The applicant wants to wait until the Final Plans to document the landscape buffer changes to area F. They have had weeks to document these changes so there is no reason to accept this request given their poor record at Lippitt Ave.

The applicant should be required to produce landscape buffer plan drawings using the most recent project plans based upon the DEM approved plans so the relationship between the buffer, the road, and fence can be clearly delineated. The current landscape plans are not at the same scale as the DEM plans making it impossible to make any accurate comparison. Nor is it possible to understand why the applicant rejects placing the buffer east of the road.

In addition, I repeat my 2021 February 2 comments:

[The landscape] condition should be revised to account for the fact that the clearcutting and grading of the woods may reveal deficiencies in the proposed landscape plan. Only after construction of the project will the true need for buffers be known. Sara Bradford's latest letter states:

“The applicant has worked responsively with the City in an effort to resolve project landscape issues and there is expectation that if the project is approved they will continue to do so through final approvals and the construction process.”

Her expectations should become a requirement. A revised condition:

“An inspection shall be conducted by a City-hired Landscape Architect after construction of the project and installation of the plantings upon receipt of the as-built plan, who will submit a report on the findings of the inspection to the Planning Department. In consultation with the Landscape Advisory Committee, the report will detail any deficiencies in the landscape plan and provide revised plans. The commission may, at its discretion, require the applicant to install additional plantings at that time. Final approval by the city to operate the site shall not be granted until this condition is met.”

If the current plans are effective, then this additional condition will be a mere formality.

The Commission has failed to address a critical issue raised by buffer plans. They rely on the abutters’ wooded land remaining in its current state. In effect, their land is appropriated by the developers to protect the abutters from the development. At the same time, the development’s property owner, Mr. Rossi, refuses to ensure his woods, necessary to buffer the northwest corner of the site, will be protected.

The Commission should require the applicant to answer these additional questions:

Will the applicant process the ledge on site or will it be removed off site for processing? If on site, how long will the process last, by best estimate?

If processed on site, will the gravel be used on site or hauled away?

Does the applicant have an estimate of the number of cubic yards of material to be removed by mechanical means or blasting?

If Green Development can meet the blasting conditions listed in my February 2 letter, why can’t Reivity?

How will the fence gap condition be enforced and who will be responsible? The applicant’s failure to observe the fence gap condition (2-5” gap) at the Lippitt Ave project and subsequent whitewashing by the DPR Committee has been documented.

The language in the lease discussed in my February 2 letter allows the property owner to improve the ROW. Submitted plans call for the ROW to be a gravel road. What do the parties to this lease mean by “improve”? Do the parties believe that the owner can pave the road? Why wasn’t this improvement clause disclosed to the Commission and the public during previous hearings? Will any improvements allowed by this lease require a new DEM Wetlands application? Will any improvements impact the SESC plan? Would any improvements effect the proposed buffer plans?

The plans for Lippitt and Natick state that there will be no stump dumps on site. However, tree debris was used as fill at the Lippitt site. Will this be the case at Natick?

Who will enforce the two-phase construction plan? DEM was unable to enforce the 5-acre plan at Lippitt. What is the penalty for failing to follow the phase construction plan?

In closing, the applicant's record of broken promises and a failure to disclose critical information has been amply documented by the DEM and my previous letters. Why does the Commission believe that this time will be different?

Sincerely,  
Douglas Doe

2/24/21

Dear Members of the Commission-

*This serves as a "pre-script" to my re-submission of my testimony for the February meeting.*

*I was not allowed to submit my testimony in response to the staff memo made public late on the Friday afternoon (1/29/21). I was told comments should have been sent in prior to the staff memo being published. This is confusing: we citizens engage with government as lay people in our non-working time (in this case, the weekend). We are also not psychic-how would we know the deadline? So, we do the best we can to respond to things in the best way we can-and as they are presented. We do not have a staff to support us. If there is a deadline for public comment, it seems important to publish that, or create a rule around it that can be followed by everyone.*

*I was then surprised to learn at the opening of the February meeting that the staff memo had been changed (via redline) from its previous 1/29 version to specifically include comments submitted by the applicant. These comments were submitted later than my own rejected testimony. How is this a reasonable and fair playing ground? I planned to read my rejected letter as testimony-but it would now be partly irrelevant.*

*That letter and the subsequent change to the 1/29 memo (which has now been formalized with yet another memo of 2/23) was in specific reference to the one offering of screening being made for my property-the only one, late to the table and, even according to the peer-review LA, inadequate.*

*Please understand: I have worked hard to represent my neighbors, to focus on the collective good of all our needs. Along with Dan Zevon, I served on the Advisory Committee to represent all abutters. During that service, I have tried to lobby no harder for my screening than I have for my neighbors. Indeed, I often back-seated my family's needs to focus on my neighbors'.*

*That said, I now have NO choice but to state that my property (like the Lawrence Family's property to the south) has NO effective proposed remedy. The only inadequate remedy proposed at all has been now even been rejected by the applicant.*

**We believed you when you set Master Plan conditions; we trusted that those would be held sacred. Those conditions are being rewritten and are not being fully met. Why?**

*Yesterday, I learned from a neighbor that the 3/2 meeting's submission deadline is 1 PM on Friday (2/26/21). Again, how are we as citizens to learn this information? I had assumed that my February submission would have automatically been sent along since the meeting did not occur and there was ample time to post my comments. But it*

*was not posted to the site as of this writing, so I take that to mean I must re-submit. But again, how would I know this?*

*I implore you to read my letter (below) and to hear these concerns about process. I also respectfully ask you to read these two recent articles (links below) in the hopes that you will find them food for thought.*

*While we may not have had these studies or research to quote from two years ago-our citizens concerns indeed proved incredibly prescient-in these and so many other related issues.*

<https://www.economist.com/finance-and-economics/2021/02/06/how-should-economists-think-about-biodiversity>

<https://www.ecori.org/natural-resources/2021/2/9/rhode-islands-green-canopy-provides-priceless-protection>

MDP

[www.hurricanehillfarm.com](http://www.hurricanehillfarm.com)

Cranston Planning Commission  
869 Park Avenue  
Cranston, RI 02921

February 1, 2021

Dear Members of the Commission,

Revelations of sleights of hand invariably reveal that the execution of each step of the trick must look real. As one famous illusionist describes the classic game of “cup and balls,” The eye can see the moves, but the mind cannot comprehend them.”

As we review yet another version of the proposed Natick Solar buffer plan, digest yet another staff memo and try to reconcile new approval conditions with old ones; I am beginning to think that our best expert witnesses might be Penn & Teller.

I expect none of us imagined we would still be meeting on this topic more than two years after our neighborhood first learned about Mr. Rossi’s plan for his property. To be honest, way back then, none of us in the community thought a project so unfit for our neighborhood would ever be approved. Surely, its radical inappropriateness would be writ so large that you, as the body charged with the overall stewardship of sound planning for our city, would not allow it to go forward. But it did go forward, on a tight (and rather strange) single vote margin.

Still, we did our part, showing up and taking the process seriously, understanding (as some of us already did and others of us would soon learn) that our city council had already and fatefully opened the door by allowing a developer-driven (and written) change to our code to happen. It was a sizeable betrayal by those we elected-one best measured by its full reversal in the wake of the mistakes made on projects further to our west and the outcry over the Natick approval.

I was and others were -and remain- personally grateful for the Commission's conditions of Master Plan approval. They reflected many – albeit not all-of the concerns raised by our community. Along with Dan Zevon, I gladly served on the Advisory Committee, working to turn the Applicant's original offering-a stockade fence-into an attempted, actual response to your first condition, to “develop an effective buffering plan.” Had you not created this committee and required an independent professional, I am pretty sure we would not even have a fence being proposed today.

Have we succeeded at your assigned task? No, we have not (even though we worked hard). We have not developed an effective buffer. Period. But that is not a surprise. You can't hide an elephant behind a Volkswagen.

**What we can do, however –what you can do-is remember that an applicant – any applicant – by the very action of applying, is at the mercy of the body that holds the right to give permission. This project is a by-right development. Absolutely. But that does not mean it is “by-right-by-any-means.”**

Many of your additional original conditions of approval-some of them now met by simple passage of time or by the straightforward passage of the project through the city and state oversight processes-remain absolutely critical to us in the neighborhood. It is unclear why some of them are now being dismissed or outright changed.

In addition to your major first condition (landscape buffer effectiveness) discussed above, blasting (your condition 7), well conditions (your condition 10) and utilities coordination (your condition 9) all remain of tremendous concern today.

We have learned (from both the January and February staff memos) that even though the staff initially recommended retaining conditions 7 and 10; the Applicant does not wish to do so.

Regarding Condition 7, the Applicant is suddenly confident that the grade changes cannot be accomplished without blasting. Surely, a professional engineering firm would have been able to say this two years ago. Wouldn't the need for blasting be a significant carry cost for financing? Are we truly to believe that until just recently the Applicant was unsure of the need to blast? And well-testing (Condition 10, and one directly related to blasting) is now considered out of possibility. Suddenly? Why?

Then we have Condition 9: utilities. Based on disastrous interconnection outcomes at another of the Applicant's Cranston installations, Staff has wisely enhanced your original condition by also recommending undergrounding of all on-site electric (indeed, that conversation was being had at the time the advisory committee was meeting and trying to address effective screening). Suddenly, this too is impossible. The blame is being placed at the feet of National Grid. Their process is described as so vague and onerous one might mistake them for a mom and pop enterprise, rather than an international energy giant. Again, the applicant has had TWO YEARS to establish a plan. What happened? National Grid has had an interconnect plan on the books since at least early December of 2019 (when it was submitted as part of the Applicant's RIDEM application for approval).

And speaking of approvals, during the two years since this project began, many different versions of the project plans have been circulated. So many, in fact, that staff constantly need to reference which set has been seen by which body, which approval applied when and to which version. I find this confusing.

I grew up in a world of architects and engineers-in many ways a latch-key kid of site offices, tackling homework at the edge of a drafting table and sometimes under one. Among the many things I learned by osmosis was that projects changed along their way-usually for the better, often at a cost but always with a consistent set of plans whose updates were noted, dated and clearly delineated. The plans followed along with the travel the of the project. Period.

While I no longer have a drafting board to spread out on, my dining room is a calamity of full plan sets and landscape pages. Comparing them is worse than sliding the blocks on a rubik's cube. Why does a site development page say "selective tree removal" but the landscape page says nothing about that? Isn't that important to the success of a buffer plan? Why is there a graveled area running north/south that is sometimes called a "path" and other times an "access road" or a "drive?" How do you (or any entity) know what you are approving if things are not consistent at each stage? For example, if we are now facing three-phase electric poles on the site, how can the current landscape proposal be evaluated for its effectiveness? Do we not need to see those poles on the drawing? Do we not need to design to them? Shouldn't all approvals be looking at the same data?

My particular childhood experience aside, my neighbors and I are lay-people. We need to rely on you and the power of your individual and shared commission to make sure that this project is executed to the highest possible standard. Right now, it's messy-there is not other word for it. And messy rarely leads to a tidy outcome.

As I write this, I face Natick Ave from my dining room table. Beyond it, I see the snow-covered slope where panels are projected to be located. Earlier this morning, as I fed our sheep, I looked across at another section of that snow-covered slope where panels are projected to be located. And, in a little while, when I carry a

thermos of coffee up to my husband's studio, I will walk along yet another view of that snow-covered slope where panels are projected to be located. There is no proposed screening for any of those locations. None.

Please clean up this mess. Please look long and hard at the impacts of this project. Please think openly. Please continue to ask questions. **Please hold the Applicant to your original conditions of approval.** Within the lots that hold the current project leasehold, surely there are better locations for this project-locations that could reduce (possibly remove) the need to blast; locations that could allow retention of existing woodland, leaving a true buffer with the many, many project abutters. Ask why this project is being forced onto the most difficult and costly part of the lot?

*"Illusion is nothing more than the exploitation of gaps in human perception."*

Respectfully,

A handwritten signature in cursive script that reads "Drake".

Drake Patten  
Hurricane Hill Farm

2021 February 2

Cranston Planning Commission  
869 Park Avenue  
Cranston, RI 02921

Dear Commissioners.

This application, approved or denied, brings to a close the disastrous solar policy enacted in 2015. While the process has improved considerably, how do the proposed conditions compare to the conditions required for the 38.4 MW Iron Mine Hill Road Solar project to be built by Green Development in North Smithfield (attached)? DiPrete Engineering (Eric Prive, PE) prepared all plans for the project.

2. “The applicant shall use reasonable efforts to remove ledge or rock by mechanical means. Nothing herein shall prohibit the use of blasting to remove necessary ledge.”

This condition translates as “Please don’t blast.” The Lippitt Ave abutters were notified of the need for blasting one week before the first blast though the applicant knew of the need months before then. All ledge removed at Lippitt was processed on site for months.

Will the applicant process the ledge on site or will it be removed off site for processing? If on site, how long will the process last, by best estimate?

If processed on site, will the gravel be used on site or hauled away?

Does the applicant have an estimate of the number of cubic yards of material to be removed by mechanical means or blasting?

No one can guarantee that wetlands on an abutter’s property will not suffer the effects of iron bacteria.

The North Smithfield Planning Board imposed far more extensive conditions:

Condition #2 - Install a minimum of 5 monitoring wells within two blast zones. Water test design, frequency, and data presentation to be developed by applicant and peer reviewer with an approach presented with Final Application. Results of well testing are public record.

Condition #15 - Blasting plan depicting blasting areas, as approved by the State Fire Marshal, shall be submitted to the Town prior to blasting. No toxins shall be used in the blasting process and soil testing in all former salvage areas, as well as those areas identifying in the applicant's archeological reports, shall be tested prior to blasting.

Condition #16 - Upon request by a property owner who owns a well within 1,000 feet of a blast site, the applicant shall test well capacity and water quality before blasting operation begins.

If Green Development can meet these conditions, why can’t Revity?

### 3. Interconnection conditions:

The interconnection process is an integral part of a solar project and cannot be considered separately or dismissed as National Grid's issue as was done at Lippitt Ave.

The residents on Natick Ave and elsewhere impacted by the interconnection plan should be notified by the city or applicant. There is no excuse for leaving them in the dark about what may happen to their front yards and trees.

Since National Grid has produced a plan, they should be required to indicate which trees will be removed. It is in the city's interest to know now unlike with the Hope and Lippitt projects when one member of the city council's Public Works committee announced that the proposed removal of over 240 trees made him sick to his stomach.

The location of the Natick Ave. right-of-way is in dispute, according to the plans, just as it was on Laten Knight Road. It is in the city's interest to avoid another ROW debacle.

The plans do not indicate how the new powerline will connect to the project's transformers. By underground lines or above ground on other poles?

The Commission has the right and obligation to consider the impact of a project on the neighborhood. The proposed interconnection is a critical element of that impact, which should be obvious to anyone who has driven down Laten Knight Road.

4. "The entire perimeter fencing shall provide for at least a 6-inch gap between the ground and the bottom of the fencing to provide adequate wildlife passage for smaller species consistent with the RIDEM approval."

How will this condition be enforced and who will be responsible? The applicant's failure to observe the fence gap condition (2-5" gap) at the Lippitt Ave project and subsequent whitewashing by the DPR Committee has been documented. See my letter to the Commission, 2021 January 4. Given the applicant's history, the condition should provide a clear detailed enforcement mechanism. This condition may not be altered. I note that the DEM wetlands permit requires the same 6-inch gap.

### 7. Landscape inspections condition

This condition should be revised to account for the fact that the clearcutting and grading of the woods may reveal deficiencies in the proposed landscape plan. Only after construction of the project will the true need for buffers be known. Sara Bradford's latest letter states:

"The applicant has worked responsively with the City in an effort to resolve project landscape issues and there is expectation that if the project is approved they will continue to do so through final approvals and the construction process."

Her expectations should become a requirement. A revised condition:

“An inspection shall be conducted by a City-hired Landscape Architect after construction of the project and installation of the plantings upon receipt of the as-built plan, who will submit a report on the findings of the inspection to the Planning Department. In consultation with the Landscape Advisory Committee, the report will detail any deficiencies in the landscape plan and provide revised plans. The commission may, at its discretion, require the applicant to install additional plantings at that time. Final approval by the city to operate the site shall not be granted until this condition is met.”

If the current plans are effective, then this additional condition will be a mere formality.

The Commission has failed to address a critical issue raised by buffer plans. They rely on the abutters’ wooded land remaining in its current state. In effect, their land is appropriated by the developers to protect the abutters from the development. At the same time, the development’s property owner, Mr. Rossi, refuses to ensure his woods, necessary to buffer the northwest corner of the site, will be protected.

8. “The site shall have a minimum of 4”-6” of suitable seed bed material where placed on existing subsoil, and a 6” requirement where placed upon areas without existing subsoil. The character of the material as ‘plantable soil’ shall be as indicated in the planting detail. The area within the fence shall be seeded with ‘low sow growing mix’ and disturbed areas outside the fenced area (except as otherwise specified by the DEM approval) will be seeded with a more pollinator and wildlife beneficial mix designated as ‘solar surround mix’ as noted in the Landscape Plans. These requirements shall be clearly reflected in the Final Landscape Plan. This condition supersedes Master Plan Condition of Approval #11.”

Condition #8 is at odds with the SESC plan, which calls for a minimum of 4” of screened topsoil. A “suitable seed bed” and “plantable soil” are not defined on the landscape plans. This condition should meet the SESC standards to avoid confusion and contradictory conditions. The applicant’s history at the Lippitt Ave project is documented and well known for failing to provide any topsoil. See my letter, 2021 January 4. Because of this past failure, the Commission should require that the applicant meet the SESC standard and that the city’s landscape architect inspect the site prior to seeding to ensure compliance with this condition. The current standard is vague and without an enforcement mechanism.

Soil Erosion and Sediment Control plan, 2019 Apr 30, rev. 2020 Nov 5

“Will existing topsoil be preserved at the site?

Yes No [We know that this is not possible.]

The site operator shall strip top soil in proposed project limit of disturbance areas. Top Soil shall be stockpiled in the location specified on the SESC plan. Stock Pile areas shall be surrounded by silt fence or approved erosion control measures to prevent migration of soils during rain events. Upon project completion, the site operation shall redistribute top soil over disturbed areas ensuring at minimum a 4” layer is provided over all disturbed areas. Additional material shall be brought on site should the need arise. Final top soil areas have been shown on the site plans as landscape areas. Top soil should be screened and free of weeds, sticks, and stones over ¾” in

size and otherwise complying with section M.18.01 of the RIDOT Standard Specifications for Road and Bridge Construction.”

### North Smithfield Planning Board

Condition # 4 - Vegetative maintenance plan to use mowers (cut) as opposed to pesticides or herbicides. Applicant to submit vegetative maintenance plan with Final Application.

Condition # 13 - Solar array operator shall coordinate with Conservation Commission to visit the site annually to observe pollinator meadow growth along with access to peer review reports.

DiPrete Engineering has added a note to the final plan set incorporating this condition. Site visits will require escort by the owner/operator.

Natural Resource Services, Inc. prepared a detailed five-year planting and maintenance plan. They specified that the seed would be “the [Northeast Native Wildflower Mix](#) with Native Grasses available from Ernst Conservation Seeds, Meadville, PA (or an NRS authorized equivalent). The seeding rate shall be 15 bulk pounds per acre, or a rate otherwise recommended by the producer.” The mix will be used under all solar panel installations. The report (attached) should be used as a guide for the Natick Ave project.

### Additional Issues

Proposed Cranston Ordinance 9-19-03, Net Metering Agreement  
Lease Agreement, Natick Hill Farm, LLC and Southern Sky Renewable Energy RI-Natick Ave-Cranston, LLC

1a. The Right of Way may also be used by Lessor, its successors and assigns (i) to access and furnish utilities to that portion of the Property not included in the Premises; (ii) to access and furnish utilities to other property owned by Lessor or its affiliates namely Lot 119 and Lot 133 both on Plat 22, and any adjacent property acquired by Lessor, its affiliates, its successor and assigns, and including all uses that may be necessary or convenient to the development of house lots on Parcel A; and (iii) with Lessee's prior consent (which consent shall not be unreasonably withheld or delayed or conditioned), for any other purpose which, in Lessee's reasonable determination, does not interfere or otherwise materially and adversely affect in any respect the System's proper and optimal operation. Lessor may at its sole expense, improve the Right of Way so long as the construction does not impair Lessee's ability to access the Premises during construction and Lessor controls dust and debris during construction so as not to negatively impact Lessee's solar panels.

The language in this lease allows the property owner to improve the ROW. Submitted plans call for the ROW to be a gravel road. What do the parties to this lease mean by “improve”? Do the parties believe that the owner can pave the road? Why wasn’t this improvement clause disclosed to the Commission and the public during previous hearings? Will any improvements allowed by

this lease require a new DEM Wetlands application? Will any improvements impact the SESC plan? Would any improvements effect the proposed buffer plans?

### DEM Approved Plans

The plans for Lippitt and Natick state that there will be no stump dumps on site. However, tree debris was used as fill at the Lippitt site. Will this be the case at Natick?

The plans propose construction in two phases. The Lippitt project was supposed to be constructed in 5-acre parcels. However, Southern Sky clear cut approximately 40 acres in violation of that pledge. Who will enforce this two-phase construction plan? DEM was unable to enforce the 5-acre plan at Lippitt. What is the penalty for failing to follow the phase construction plan?

The City Council learned the lessons of the Lippitt Ave solar project and banned utility scale solar projects from residential zones. I've attached a list of lessons learned by objective observers of what happened at that site. The Commission should heed those lessons and reject this preliminary plan application if the applicant does not withdraw the application voluntarily. I note that the applicant has requested an extension of the master plan approval. The Commission should grant the request and reconsider the proposed conditions in light of the conditions accepted by Green Development. The Natick Ave neighborhood deserves no less and so much more than the Lippitt Ave neighborhood received.

Sincerely,  
Douglas Doe  
178 Lippitt Ave  
Cranston, RI 02921

What lessons have been learned and how will they inform any proposed conditions?  
Given this knowledge, how can the conditions be written to be robust and enforceable?

We know that the applicant has a history of broken promises, a failure to disclose, and misrepresentations as documented in my letter of 2021 January 4 to the Commission.

We know that a DEM Wetlands Permit and Soil Erosion and Sediment Control plan will not protect wetlands as documented in DEM inspection reports dated 2019 August 28 and earlier.

We know that DEM is understaffed and unable to provide prompt inspection and enforcement of conditions. The Lippitt project began 2017 September; first DEM inspection 2018 January 24.

We know the interconnection requirement is an integral part of the solar project not a separate project.

We know that topography not distance is the critical issue in determining effective buffer zones.

We know that conditions without effective enforcement mechanisms are easily ignored by developers.

We know that city officials failed to conduct inspections of documented violations of conditions.

We know that clear cutting, removing all stumps and vegetation, and grading destroys existing top soil.



April 23, 2020

Thomas J. Kravitz, Town Planner  
Town of North Smithfield Planning Dept.  
P.O. Box 248  
North Smithfield, RI 02876

RE: Iron Mine Solar – Preliminary Approval Conditions

Dear Mr. Kravitz,

We have prepared this overall summary of the preliminary conditions of approval and the steps that have been taken to incorporate and/or address the conditions as part of the final submission for Planning Board review and approval.

#### Conditions of Preliminary Plan Approval

- 1. The developer and solar array operator shall pay the fee for the Town's independent engineer, hired by the Town, to monitor all phases of construction for compliance with local and state laws as well as provisions of this approval with monthly peer review updates provided to the Planning Board as part of staff's report.**

No action needed. Green agrees with this condition of approval.

- 2. Install a minimum of 5 monitoring wells within two blast zones. Water test design, frequency, and data presentation to be developed by applicant and peer reviewer with an approach presented with Final Application. Results of well testing are public record.**

RPS Group has prepared a proposal for water test design, frequency, locations and data presentation for the Town of North Smithfield and peer reviewer to evaluate. This is included under separate cover. The results will be provided to the Town's Peer Reviewer, the Town Planner, and the City of Woonsocket Water Department.

- 3. Peer review to oversee all work in historical salvage areas with said areas to be tested for soil contamination prior to earthwork. All contaminated soils, if present, shall be remediated in accordance with RIDEM waste management regulations.**

RPS has prepared a proposal for addressing this condition as well condition 15 related to testing before blasting. See attached response from RPS.

- 4. Vegetative maintenance plan to use mowers (cut) as opposed to pesticides or herbicides. Applicant to submit vegetative maintenance plan with Final Application.**

Natural Resource Services, Inc. has prepared a 5-year vegetative maintenance plan as part of the final submission. Pesticides/ Herbicides are not proposed.

**5. Create gated access to protected archeological sites to allow Heritage Association access upon request.**

The proposal in the final plan is to include the preservation areas within the overall solar fence. The panels within this area have been removed and trees will only be flush cut (no stump removal) to minimize disturbance. Access can be provided periodically as needed with the Heritage Association with appropriate indemnification to the project and property owners as needed.

**6. Applicant to further investigate and separately fence multiple archeological sites with assistance from the Town's Heritage Association, or, remove GDIM 3 entirely. Decision to be presented with Final plan application.**

See Response to #5, above.

**7. If solar project power is increased above 38.4 megawatts AC, the project shall require Planning Board review. If increased above 40 megawatts, require Rhode Island Energy Facility Siting Board Review. Applicant shall obtain input from National Grid regarding the potential for increased usage of the substation and submit said input with Final plan application.**

A note has been added to the final plans to address this condition. The project will not exceed 38.4 MW AC.

Based on our discussion with National Grid it is our understanding that any increased usage or expansion of the substation in the future will require coordination with the Town through the appropriate review process.

**8. Applicant must submit a Bond to protect Iron Mine Hill Rd - bond amount to be established by peer reviewer and submitted with Final Plan Application.**

Green provided the Town a cost to mill and overlay Iron Mine Hill Road if it were needed after construction. Green proposed a bond for \$150,000 and are awaiting confirmation on the amount. Green also coordinate with BETA to provide a scope of work for pre-condition and post condition survey of the 1 mile distance from the site entrance to Farnum Pike. Green executed BETA's proposal and this work is currently in progress. The pre-condition results will be provided to the Town Planner, Public Works Director, and the Town's peer review engineer. The post condition results not anticipated to be needed until late 2021 will be similarly shared.

**9. Applicant shall comply with ambient sound testing as required per zoning section 5.7. lg and 5.7.5.e.2 Locate, on a plan, all areas from where sound readings were taken. Confirm with National Grid that the substation will also follow Town noise ordinance.**

The required ambient sound testing will be conducted upon preparation of the Site. The locations where reading will be taken, methodology, etc. will be provided to the Town in advance of this work. National Grid's substation will also need to follow the Town's noise ordinance.

**10. Provide Health Product Declarations/Environmental Product Declarations on all panels installed on site. If any are to be replaced, they are to provide new**

**product data. All panels to be silicon in nature and not contain toxins.**

MSDS sheets were provided at the preliminary stage of review. Our contact with the panel supplier indicated the Health Product Declarations / Environmental Product Declarations are not available. We will reconfirm this at the time the panel order is placed and update the Town accordingly.

- 11. Submit landscaping plan as discussed for Plat 12, lot 291 and submit with Final Plan Application. Applicant to maintain said buffer per zoning section 5.7.5.g.1**

A final landscape plan prepared by BETA is included with the final submission.

- 12. Exterior lighting for the substation control building will consist of a south-facing light controlled by a motion sensor . All lighting at substation shall be dark sky compliant with no offside lighting impacts. Applicant to ensure National Grid is aware of this condition with input from National Grid submitted with Final Application.**

With respect to the control building National Grid confirmed that there will be a light on the north side (transmission ROW side) of the building. National Grid has specified the control building lighting to be dark sky compliant and normally off and manually controlled. Outdoor lighting on 25 foot tall light poles around the inside perimeter of the fence is also required for nighttime emergency work in the event of equipment failure. These lights are also manually controlled and normally off.

- 13. Solar array operator shall coordinate with Conservation Commission to visit the site annually to observe pollinator meadow growth along with access to peer review reports.**

DiPrete Engineering has added a note to the final plan set incorporating this condition. Site visits will require escort by the owner/operator.

- 14. Operator shall notify Planner and or Building Inspector prior to cleaning panels; use only water to clean panels.**

DiPrete Engineering has added a note to the final plan set incorporating this condition.

- 15. Blasting plan depicting blasting areas, as approved by the State Fire Marshal, shall be submitted to the Town prior to blasting. No toxins shall be used in the blasting process and soil testing in all former salvage areas, as well as those areas identifying in the applicant's archeological reports, shall be tested prior to blasting.**

The blasting contractor will be required to obtain the necessary state fire marshal and local permits prior to blasting and in accordance with local ordinances. See also response to #3.

- 16. Upon request by a property owner who owns a well within 1,000 feet of a blast site, the applicant shall test well capacity and water quality before blasting operation begins.**

DiPrete Engineering has added a note to the final plan set incorporating this condition.

**17. Peer review shall be provided a construction schedule with key milestones as to make for efficient use of peer review time.**

A preliminary project schedule is provided. This will be adjusted with additional detail as the project progresses.

**18. Applicant must satisfy the City of Woonsocket Water Department regarding their letter dated March 4, 2020, and, the City's peer review needs with evidence to such submitted with Final plan application.**

We have received the correspondence of March 4, 2020 and correspondence dated March 23, 2020 including the City's peer review memorandum. Attached with this final submission are follow-up materials submitted to the City of Woonsocket in response.

**19. Applicant shall submit liability insurance as required by zoning section 5.7.5.q.**

Attached are copies of liability insurance to satisfy Zoning section 5.7.5.q. The Town and the GDIM entity are both listed on the certificates of insurance.

**20. Applicant to discuss potential for conservation easement to protect archeological areas and report back at Final plan application.**

The final plan depicts the area around the archaeological areas to remain with no solar proposed. We propose that the original solar chain link fence location remain and as a result the solar lease area and fence will serve to protect the archaeological area over the life of the lease. During construction, a temporary snow fence will be placed as a visual barrier. Trees within this zone will be flush cut with no removal of stumps or roots proposed.

**21. Applicant to support evidence of enforcement regarding construction traffic plan and include notification to National Grid contractors and subcontractors (being mindful of speed limits given presence of school properties in the area).**

Attached is a memo outlining the construction traffic plan. We have requested that National Grid include this in the bidding documents for the substation so that it is incorporated accordingly.

We look forward to working with the Planning Board on the final approval for the project.

Regards,

Green Development, LLC

Kevin Morin, PE

Director of Engineering and Project Development

cc: John Mancini, Mancini-Carter, PC  
Eric Prive, PE, DiPrete Engineering  
Tom Daley, RPS Group

Date: April 22, 2020

Mr. Kevin Morin  
Green Development, LLC  
3760 Quaker Lane  
North Kingstown, Rhode Island 02852**RE: Response to Conditions of Preliminary Approval  
GDIM 1-9, Iron Mine Hill Road Solar  
North Smithfield, Rhode Island**

Dear Mr. Morin:

As requested by Green Development, LLC. (Green Development), RPS Group Inc. (RPS) has prepared this letter describing the proposed actions to be taken based on the town of North Smithfield's Preliminary Plan Decision of Approval for the above-referenced project. Specifically, this letter addresses item numbers: 2, 3, 15 and 18 of the Conditions of Preliminary Plan Approval.

## Proposed Actions

**Condition #2** - *Install a minimum of 5 monitoring wells within two blast zones. Water test design, frequency, and data presentation to be developed by applicant and peer reviewer with an approach presented with Final Application. Results of well testing are public record.*

**Proposed Actions** – Subject to review by the town's peer reviewer, Pare Corporation (Pare), RPS and a drilling subcontractor will install five groundwater monitoring wells in key down-gradient locations around the perimeter of the proposed blast areas on the project site. The wells will be located in areas adjacent to the limits of disturbance in areas where no blasting or grade changes are proposed. Locations of the proposed wells are depicted on **Figure 1**. The monitoring wells will be installed at a depth of approximately 6 feet below the field observed groundwater table. Each well will be constructed of PVC well materials, consisting of a ten foot well screen and a solid riser pipe extending to the ground surface. A bentonite seal will be installed in the annular space around the riser pipe to prevent surface water from entering the well. All wells will be finished with a locking steel guard pipe cemented in place.

After construction, the wells will be developed to purge of any sand or sediment from the well and left to recover. After recovery all wells will be sampled using standard sampling techniques. Quality control procedures will include collection of a duplicate sample from one of the wells. Collected samples will be placed in laboratory pre-cleaned sample containers and stored in a cooler at approximately 4° C. The

samples will be transported under chain-of-custody protocol to a Rhode Island state certified laboratory for analyses. Each sample will be analyzed for the following constituents which may be associated with blasting: nitrate, nitrite, sulfates and perchlorate. The wells will be sampled a minimum of two times:

- Prior to commencement of blasting operations; and
- Within two weeks following completion of blasting operations.

The laboratory results will be compared to the appropriate RIDEM GA groundwater criteria and any exceedance of the criteria will be identified and reported if required by RIDEM regulations. If a reportable condition is identified A draft report will be prepared detailing the findings of the investigation and submitted to Pare for review and comment. Upon receipt of comments from Pare, a final report will be prepared and submitted to Green Development and the town of North Smithfield.

**Condition #3** - Peer review to oversee all work in historical salvage areas with said areas to be tested for soil contamination prior to earthwork. All contaminated soils, if present, shall be remediated in accordance with RIDEM waste management regulations.

**Proposed Actions** – Subject to review by Pare, RPS and Green Development will conduct subsurface soil investigation in the historic auto salvage areas located within the limits of disturbance of the proposed project. Additional soil investigation will also be conducted in the four areas where post cultural automobile related materials were identified during the archeological survey of the site. The soil testing will consist of the excavation of a total of 22 test holes. The soil testing will consist of 18 test holes to be conducted in a grid pattern across the former auto salvage areas and four additional test holes to be conducted in the archeological survey areas. The proposed locations of the test holes are depicted on **Figure 2**.

Each test hole will consist of excavation of a hole using a backhoe to a depth of approximately 10 feet or refusal if less than 10'. The soils will be logged for characterization purposes and inspected for visual and/or olfactory evidence of contamination. Soils samples from various depths within each hole will be field screened for the presence of volatile organic compounds (VOCs) using a photoionization detector (PID). Ten soil samples will be collected for laboratory analyses. The ten samples chosen will be from the test holes exhibiting the greatest evidence of contamination (either from PID readings or visual evidence). If no evidence of contamination is observed the samples to be analyzed will be chosen randomly to cover a representative area of the entire investigation area.

Quality control procedures will include collection of a duplicate sample from one of the test holes. Collected samples will be placed in laboratory pre-cleaned sample containers and stored in a cooler at approximately 4° C. The samples will be transported under chain-of-custody protocol to a Rhode Island state certified laboratory for analyses. Each sample will be analyzed for the following constituents commonly associated with auto salvage areas: VOCs, total petroleum hydrocarbons (TPH), total lead, total mercury, and ethylene glycol.

The laboratory results will be compared to the appropriate RIDEM soil criteria and any exceedance of the criteria will be identified and reported if required by RIDEM regulations. A draft report will be prepared detailing the findings of the investigation and submitted to Pare for review and comment. Upon receipt of

comments from Pare, a final report will be prepared and submitted to Green Development and the town of North Smithfield.

**Condition #15** - *Blasting plan depicting blasting areas, as approved by the State Fire Marshal, shall be submitted to the Town prior to blasting. No toxins shall be used in the blasting process and soil testing in all former salvage areas, as well as those areas identifying in the applicant's archeological reports, shall be tested prior to blasting.*

**Proposed Actions** – A blasting plan will be prepared by the selected blasting contractor and will be submitted to the State Fire Marshall and the Town of North Smithfield in accordance with applicable state and local regulations. A site plan depicting the extents of the areas where rock blasting is to occur will also be submitted to the Town. The blasting plan will include a prohibition of the use of perchlorate containing (toxic) blasting agents for the project.

Soil testing as described above will be conducted prior to blasting operations in the historic auto salvage areas located within the limits of disturbance of the proposed project; and in the four areas where post cultural automobile related materials were identified during the archeological survey of the site.

**Condition #18** - *Applicant must satisfy the City of Woonsocket Water Department regarding their letter dated March 4, 2020, and, the City's peer review needs with evidence to such submitted with Final plan application.*

**Proposed Actions** – Subject to review by Pare, RPS will conduct surface water sampling of Spring Brook. Surface water sampling will consist of collection of grab samples at two locations on Spring Brook: at the source of the brook (the outlet of the large on-site wooded swamp wetland); and from the brook channel where it exits the project property. The proposed sampling locations are depicted on **Figure 1**.

Surface water samples will be collected using clean disposable plastic bailers. Collected samples will be placed in laboratory pre-cleaned sample containers and stored in a cooler at approximately 4° C. The samples will be transported under chain-of-custody protocol to a Rhode Island state certified laboratory for analyses. Per recommendation of the City of Woonsocket Water Division, each sample will be analyzed for the following constituents which may be associated with soil disturbance and auto salvage operations: VOCs, TPH, ethylene glycol, turbidity, total suspended solids (TSS) and settleable solids. Surface water samples will be collected two times:

- Prior to commencement of construction activities, and
- Within two weeks following completion of construction activities.

The laboratory results will be compared to the appropriate RIDEM surface water criteria and any exceedance of the criteria will be identified and reported if required by RIDEM regulations. A draft report will be prepared detailing the findings of the investigation and submitted to Pare for review and comment. Upon receipt of comments from Pare, a final report will be prepared and submitted to Green Development, the town of North Smithfield, and Woonsocket Water Superintendent.

If you have any questions regarding this, please feel free to contact me at (401) 661-8646.

Our Ref: Iron Mine Solar, Project # 207430



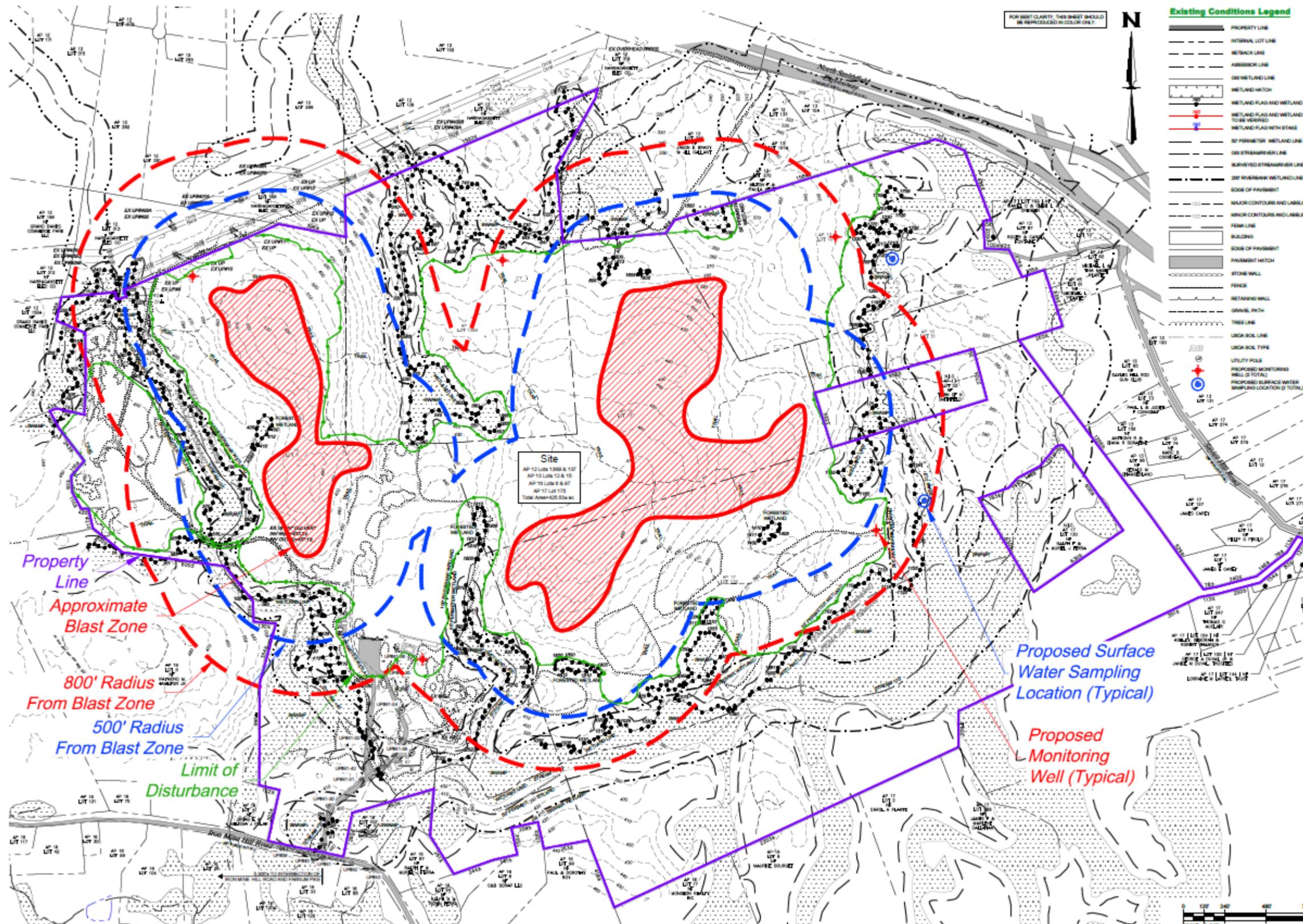
Yours sincerely,  
for RPS Group, Inc.

A handwritten signature in blue ink, appearing to read 'Tom Daley', is positioned above the printed name.

**Thomas Daley**  
**Manager I, Compliance and Multi-Media**  
Tom.Daley@rpsgroup.com  
401-661-8646

Attachment: Figures

FIGURE 1 - PROPOSED GROUNDWATER MONITORING WELLS AND SURFACE WATER SAMPLING LOCATIONS



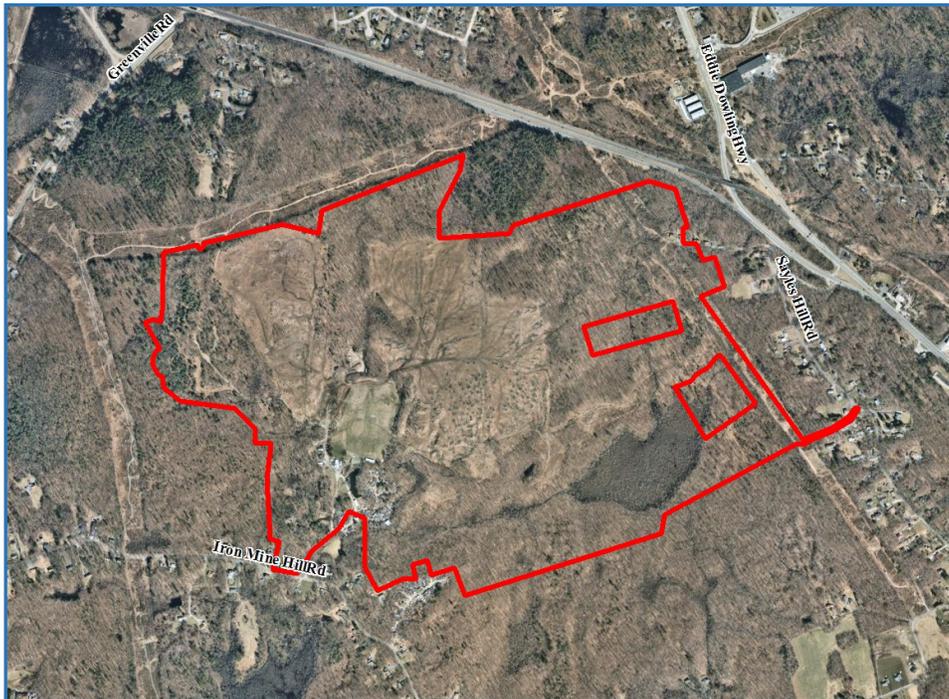
Notes: 1. Base map prepared by Green Development LLC.  
 2. Scales of the original drawing have been reduced.



## **Natural Resource Services, Inc.**

### Pollinator Habitat Establishment and 5 Year Management Plan

Iron Mine Solar  
A.P. 12, Lots 136B & 137; A.P. 13, Lots 12 & 51  
A.P. 16, Lots 6 & 97; A.P. 17, Lot 175  
North Smithfield, Rhode Island



Prepared for:  
Kevin Morin, PE  
Green Development, LLC  
2000 Chapel View Boulevard, Suite 500  
Cranston, RI 02920

Prepared by:  
  
Scott P. Rabideau, PWS  
Principal

April 24, 2020

## Introduction

Natural Resource Services, Inc. (NRS) was retained by Green Development, LLC (GD) to prepare a pollinator habitat management plan for a 168 acre utility scale solar facility in North Smithfield, Rhode Island. The purpose of this report and the attached geographic information systems (GIS) graphic is to detail the methodology for establishing pollinator species throughout the constructed solar facility, and to provide a five (5) year management plan to ensure that the establishment of the targeted habitat is successful.

This report shall be submitted to the North Smithfield Planning Board to fulfill a requirement of the Preliminary Plan approval for the solar facility issued on March 9, 2020.

## Guidelines for Establishing Pollinator Habitat

Pollinator species and warm season grasses typically do well on sites that are infertile and low in available nitrogen. The installation of the solar panels across the 168 acre footprint shall require tree cutting, stumping and general regrading. All available topsoil shall be stripped and stockpiled during this process. This forest loam is of lesser quality and considered a low nitrogen soil. Fertilization is not necessary as the herbaceous species to be established do not require significant nutrient levels. The reuse of the native soil will also help to discourage weed growth which normally proliferates when nitrogen levels are elevated.

The month of May is generally considered the best time to seed wildflowers and warm season grasses. When a spring seeding is not possible, the alternative is to seed in early fall, September 15<sup>th</sup> through October 15<sup>th</sup>. A fall seeding schedule requires a topseed effort the following spring. It is best that spring seeding occurs only after soil temperatures have reached at least 50 degrees Fahrenheit. A fall seeding does not result in germination until the following spring. As such areas with exposed soil should be mulched with loose straw to discourage erosion throughout the winter.

The seeding shall be accomplished using two methods. The primary method shall be broadcast seeding. The broadcast method requires that each location be covered twice, with the second pass being perpendicular to the first. This cross-hatch pattern will assist in achieving an even stand of new growth. The seeded areas shall be lightly raked to cover the seed with soil. The area shall be rolled to ensure good soil contact and mulched with loose straw.

The seed mixture shall be the Northeast Native Wildflower Mix with Native Grasses available from Ernst Conservation Seeds, Meadville, PA (or an NRS authorized equivalent). The seeding rate shall be 15 bulk pounds per acre, or a rate otherwise recommended by the producer.

It may be necessary to use a no-till seed drill on slopes or other areas where broadcast spreading is not appropriate. NRS will work with the site contractor to identify these areas at the start of the project.

A one-half acre wildflower nursery location shall be established at the entrance to the facility. This nursery shall be seeded with the wildflower mixture, watered as needed, and weeded manually throughout the season. Once established, the nursery will provide additional plants and seeds which can be used to fill-in any bare spots across the project area.

### Establishment and Monitoring – Year 1

Due to the size of the solar facility, NRS has segmented the area into five (5) sections. This has been done solely for monitoring purposes. Each annual monitoring report shall include a chapter describing the conditions within a specific segment. The attached GIS graphic depicts the anticipated segmentation.

Weeds and cool season annual grasses are expected to germinate throughout the first 1 – 2 growing seasons. This management plan does not include the use of any chemical (herbicide) treatment for controlling weeds or other noxious plants. Instead, a “top-clip” method shall be employed to control weed growth. The weeds and cool season species germinate earlier each season than the wildflowers and warm-season grass seedlings. When the undesirable vegetation reaches a height of 12-18 inches, a flail mower shall be used to top-clip the weeds to a height of not less than 6 inches. This will prevent the weeds from going to seed.

In Year 1 and 2, it may be necessary to perform a second top-clip in late summer. This follow-up cut will be done only at the direction of NRS. Any second top-clip will have the flail mower cut to a height of not less than 12 inches.

NRS shall inspect and inventory each of the 5 project segments on or before August 15<sup>th</sup> of Year 1. A report shall be prepared for GD which describes the site conditions and provides recommendations for additional management activities which may be necessary. A rapid assessment survey of pollinators utilizing the area shall be performed with the results included in the report.

The entire area shall be cut in the fall. NRS shall re-inspect the site in early September and establish a date for the fall cutting.

### Maintenance and Monitoring – Years 2 – 5

NRS will inspect the pollinator habitat throughout the solar facility a minimum of three (3) times per growing season. The initial inspection shall occur on or about May 15<sup>th</sup> of each year. The purpose of this visit is to determine the areas where weeds and other undesirable vegetation have germinated. This inspection will serve to direct the effort for top-clipping activities.

NRS shall perform a plant species inventory and rapid assessment survey of pollinator species utilizing the habitat on or before August 15<sup>th</sup> of each year. A report shall be prepared for GD which describes the site conditions and provides recommendations for additional management activities. These recommendations may include transplanting stock for the nursery to fill-in bare spots identified in each project segment.

NRS shall perform a final inspection in early to mid-September of each year. The purpose of the September inspection is to determine if seed heads from the annual plants have dropped and using this information to set a date for fall cutting.

#### Final Year 5 Report

NRS shall perform a site wide inventory of plant species. This survey will be performed during the month of August in year 5. This inventory shall attempt to list all plant species and provide an indication of their relative abundance. A rapid assessment survey of pollinator species utilizing the habitat shall also be performed. A final report shall be generated subsequent to the survey. This report shall include a chart with all plant and pollinator species documented by the survey. NRS shall provide an opinion as to the relative success of the pollinator habitat creation project. Finally, the report shall include a management plan for GD to follow for the next 5 years.

**Legend**

- Approximate Property Lines\*
- Approx. Stream Locations\*
- Approx. Forested Swamp
- Approx. Shrub Swamp
- Approx. Pond
- Segment 1 (+/- 12 ac)
- Segment 2 (+/- 19.5 ac)
- Segment 3 (+/- 22.8 ac)
- Segment 4 (+/- 68 ac)
- Segment 5 (+/- 39.5 ac)

\*Property lines, wetland edges, stream locations, solar array locations provided by Green Development, LLC



EDDIE DOWLING HWY (RT. 146)

IRON MINE HILL RD

FOR ILLUSTRATIVE PURPOSES ONLY  
NOT A SURVEY PLAN

**Pollinator Habitat Establishment & 5 Year Management Plan**  
**Iron Mine Solar**  
 Green Development, LLC  
 A.P. 12, Lots 136B & 137; A.P. 13, Lots 12 & 51  
 A.P. 16, Lots 6 & 97; A.P. 17, Lot 175  
 North Smithfield, RI

March 21, 2020  
 image (c) nearmap  
 Natural Resource Services, Inc.  
 100 Trisham Lane  
 North Smithfield, RI 02896  
 P: (401) 598-7390  
 F: (401) 598-7400

## Notes

### Pollinator Habitat Establishment & 5 Year Management Plan

#### Year 1 – Establishment & Monitoring

- 1) Site grading and installation of solar panel stancions.
- 2) Broadcast or no-till seed drill entire area with Showy Northeast Wildflower Seed Mix with Native Grasses (see analysis). On or around May 1<sup>st</sup>, but no later than June 15.
- 3) Lightly rake and roll all seeded areas then mulch with loose straw.
- 4) Setup and establish a 20,000 square foot nursery area, seed and irrigate.
- 5) Top-clip weeds in late August at the direction of NRS.
- 6) Site monitoring in August by NRS with report issued by September 1<sup>st</sup>.
- 7) NRS site monitoring by September 15<sup>th</sup> to set date for fall cutting.
- 8) Fall cutting by date established.

#### Year 2 – Maintenance & Monitoring

- 1) NRS to inspect prior to May 15<sup>th</sup>.
- 2) Top-clip with flail mower prior to June 30<sup>th</sup>.
- 3) NRS plant inventory and rapid assessment pollinator survey on or before August 15<sup>th</sup> with report by September 1<sup>st</sup>.
- 4) NRS site monitoring by September 15<sup>th</sup> to set date for fall cutting.
- 5) Fall cutting by date established.

#### Year 3 – Maintenance & Monitoring

- 1) NRS to inspect prior to May 15<sup>th</sup>.
- 2) Top-clip with flail mower prior to June 30<sup>th</sup>.
- 3) NRS plant inventory and rapid assessment pollinator survey on or before August 15<sup>th</sup> with report by September 1<sup>st</sup>.
- 4) NRS site monitoring by September 15<sup>th</sup> to set date for fall cutting.
- 5) Fall cutting by date established.

#### Year 4 – Maintenance & Monitoring

- 1) NRS to inspect prior to May 15<sup>th</sup>.
- 2) Top-clip with flail mower prior to June 30<sup>th</sup>.
- 3) NRS plant inventory and rapid assessment pollinator survey on or before August 15<sup>th</sup> with report by September 1<sup>st</sup>.
- 4) NRS site monitoring by September 15<sup>th</sup> to set date for fall cutting.
- 5) Fall cutting by date established.

#### Year 5 – Maintenance & Monitoring

- 1) NRS to inspect prior to May 15<sup>th</sup>.
- 2) Top-clip with flail mower prior to June 30<sup>th</sup>.
- 3) NRS to perform a site wide inventory of all plant species. This survey will include a rapid assessment of pollinator species observed on-site. The work shall be performed during the month of August.
- 4) NRS shall prepare a final report assessing the relative success of the pollinator habitat creation project.
- 5) NRS shall prepare a 5 year management plan for GD without NRS oversight.

#### Seed Mix Analysis

Modified Showy Northeast Native Wildflower Mix with Native Grasses (ERN-MX-153) (15 bulk pounds per acre)		
16.0%	<i>Andropogon scoparius</i>	Little Bluestem
10.0%	<i>Elymus villosus</i>	Silky Wild Rye
10.75%	<i>Sorghastrum nutans</i>	Indian Grass
7.75%	<i>Panicum virgatum</i>	Switch Grass
6.00%	<i>Chamaecrista fasciculata</i>	Partridge Pea
5.00%	<i>Andropogon gerardi</i>	Big Bluestem, Niagara
5.50%	<i>Habropis leucanthoides</i>	Ox Eye Sunflower
5.50%	<i>Rudbeckia hirta</i>	Black Eyed Susan
4.50%	<i>Peweenia digitalis</i>	Tall White Beard Tongue
5.25%	<i>Lupinus sp.</i>	Big Leaf Lupine
4.50%	<i>Senna hebecarpa</i>	Wild Senna
3.00%	<i>Hypochaeris pyramidalatum</i>	Great St. John's Wort
1.50%	<i>Liatris spicata</i>	Marsh (Dense) Blazing Star
3.00%	<i>Astilbe spicata</i>	Common Milkweed
2.00%	<i>Asclepias tuberosa</i>	Butterfly Milkweed
2.00%	<i>Sibthamiam trifoliatum</i>	Whorled Robinweed
3.50%	<i>Echinacea purpurea</i>	Purple Coneflower
2.00%	<i>Zizia aurea</i>	Golden Alexanders
0.75%	<i>Aster novae-angliae</i>	New England Aster
1.00%	<i>Baptisia australis</i>	Blue False Indigo
0.50%	<i>Leibolzia capitata</i>	Round Head Lespedeza

### **Pollinator Habitat Establishment & 5 Year Management Plan Iron Mine Solar**

Green Development, LLC

A.P. 12, Lots 136B & 137; A.P. 13, Lots 12 & 51

A.P. 16, Lots 6 & 97; A.P. 17, Lot 175

North Smithfield, RI

April 9, 2020

Sheet 2 of 2

8/26/2020

32

## Solar company facing questions after blast shakes nearby homes

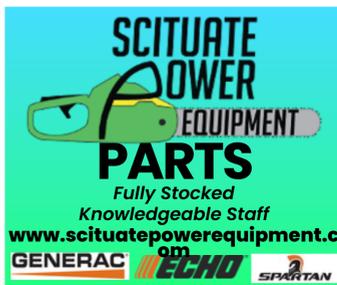
By LAUREN CLEM, Valley Breeze Staff Writer

NORTH SMITHFIELD – The company building a large solar farm off Iron Mine Hill Road has agreed to changes in how it conducts blasting and notification after a construction blast last week shook nearby homes, sparking an outcry among residents.

The blast took place last Thursday, Aug. 20, around 4 p.m. Within a few hours, residents had taken to social media to ask questions about the explosion, with many reporting earthquake-like tremors felt through their homes. Residents reported hearing the blast as far as Woonsocket Hill Road and as nearby as Valley View Drive, and several raised concerns about the status of their wells or building foundations.

Town Administrator Gary Ezovski told The Breeze he also began getting phone calls shortly after the incident Thursday afternoon.

“The initial calls were, frankly, ‘There’s been an explosion.’ I think as we all got to learn more, it pointed to the Green Development site, and that’s where our fire marshal and chief sent people and went themselves,” he said.



Ezovski said several callers reported items falling from shelves or from the walls of their garages as a result of the blast.

After confirming the blast came from the Green Development site, town officials set up a meeting with Green Development and the blasting subcontractor, A-1 Drilling and Blasting Company of

Uxbridge, Mass., this past Monday. During that meeting, they learned the blast was one of several that have taken place as the company clears the area for solar panels. While the first five blasts did not prompt any calls from residents, the sixth blast was felt for at least a mile around the site.

In an email to residents on Tuesday, Ezovski said this stronger impact was likely due to a longer blast time.

“We have been advised that extended times such as that will not be used in future work,” he said.

Blasting was one of the main concerns raised by neighbors as well as the Woonsocket Water Division when the company sought its preliminary approval last spring. At the time, Green Development Director of Development and Engineering Kevin Morin told Planning Board members that none of the neighbors were located within the radius for state blasting regulations to apply. State law requires companies notify residents within 500 feet of a blast site at least 24 hours prior to the blast.

As part of their preliminary approval, the company agreed to install monitoring wells within the blast zones to test water quality before and after blasting and to conduct well testing for property owners within 1,000 feet of the blast site by request.

When the company returned for its final approval in June, several board members, including Jeffery Porter and Megan Staples, asked whether Green Development could use mechanical removal instead of blasting to level the site. Company representatives said that blasting had been part of the plans since the beginning, and the plans passed on a 4-1 vote.

In mid-June, letters went out to abutting property owners warning them about the upcoming blasting.

On Tuesday, Ezovski said Green Development has agreed to changes in its solar panel racking system to eliminate the need for blasting in some areas. Those changes, he said, will take into account reducing the total number of blasts.

Ezovski said the company has also agreed to additional seismic monitoring during future blasts. State law, he said, only requires one seismic monitor, and the monitor on the site did not show any readings exceeding state limits during last week’s blast. Blasting permits are traditionally awarded by the state fire marshal, with limited oversight on the town’s part.

“We have asked for increased oversight and are currently receiving cooperative response from all parties,” he said.

In response to a request from The Breeze, Green Development issued a statement Tuesday describing their efforts to mitigate residents’ concerns. In addition to contacting residents who made complaints, the blasting company has set up a phone notification system for future blasts.

“Green will continue to work with the town in a spirit of cooperation to be responsive and lessen the type of blasting that raised concerns last week,” said Green Development spokesperson Bill Fischer.

Fischer said all previous blasts have been conducted in compliance with local and state ordinances.

“Multiple professionals, including engineers, monitor each blast closely, and the state requires a seismic monitor to measure each blast to ensure it does not exceed 132 decibels,” he said. “To date, each recorded blast has measured 50 to 70 percent less than that stipulated decibel limit.”

It’s not the first time the company has faced complaints over its solar farm construction. In 2018, the Rhode Island Department of Environmental Management ordered Green Development to install additional stormwater measures after a neighbor reported heavy flooding at their property abutting a Richmond solar farm.

**The Valley Breeze is committed to keeping quality news stories like this one free to our readers. You can be a huge part of this local journalism success story by making a one-time or monthly contribution to what we do every week. Thank you as always for reading.**

Ezovski said the town hopes to have its own peer review engineer present during future blasting events.

Residents who want to be added to the call list for future blasting notifications can call A-1 Drilling and Blasting at 508-779-7737. Residents who want to file a damage complaint can contact the State Fire Marshal’s office at 401-889-5555.

[Log in or register to post comments](#)

### Comments

#### "Green Energy"

[Permalink](#) | Submitted by Veritas on Thu, 2020-08-27 07:42

Knocking items off walls of the abutting neighbors doesn't sound too "green" to me. And, I wonder if the "green" proponents are down with blasting in order to remove rocks - I don't believe blasting is too environmentally friendly, but hey, it's in the pursuit of "green" energy so let's not worry about trees, animals and the neighbors!

[Log in or register to post comments](#)

#### Green Development Double Speak

[Permalink](#) | Submitted by mydrivec on Thu, 2020-08-27 11:24

“Multiple professionals, including engineers, monitor each blast closely, and the state requires a seismic monitor to measure each blast to ensure it does not exceed 132 decibels,” he said. “To date, each recorded blast has measured 50 to 70 percent less than that stipulated decibel limit.”

Simple Math.  
132 decibel limit X .5 = 66 decibels?  
132 decibel limit X .3 = 39.6 decibels?

For reference ( <https://ehs.yale.edu/sites/default/files/files/decibel-level-chart.pdf> ), 39 decibels is a Suburban area at night and quieter than your refrigerator. 66 decibels is the level of a normal conversation and quieter than chamber music.

Wow, that is some magical blasting. I’m no a meteorologist but I know a snow job when I see one.

Let’s not even discuss the fact that a seismic monitor measures ground motion from seismic waves. I was not able to find any online seismic monitors that measure noise level.

[Log in or register to post comments](#)

#### The decibel math corrected

[Permalink](#) | Submitted by Victor on Sat, 2020-08-29 13:20

@mydrivec

Decibels use a logarithmic scale, not a linear scale that you assumed with the equations you posted. With a logarithmic scale, subtracting 10 dB divides the power by 10, subtracting 20 dB divides the power by 100, etc.

A power level 50% below 132 decibels is 129 decibels (approx. 3 dB reduction when dividing power in half). The math makes sense if you understand the decibel system.

If we want to debate and promote change, it’s best to avoid jumping to accusing engineers or scientists of lies and conspiracies simply because we don’t understand their engineering or scientific methodology and jargon. We won’t get anywhere if our arguments are nonsensical.

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#### Victor

[Permalink](#) | Submitted by mydrivec on Sun, 2020-08-30 10:47

Unlike most in this town, I can admit when I’m wrong. I appreciate the education/correction. Though you could have been a bit less condescending about it.

For the record, companies dealing with North Smithfield have proven they are smarter and shadier than our elected officials time and time again. There’s a reason they come here to find the easy mark. Only one TC member voted against this farm. I hope he is rewarded this fall.

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### Storm Cancellations

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Cranston Planning Commission  
869 Park Avenue  
Cranston, RI 02921

February 1, 2021

Dear Members of the Commission,

Revelations of sleights of hand invariably reveal that the execution of each step of the trick must look real. As one famous illusionist describes the classic game of “cup and balls,” The eye can see the moves, but the mind can not comprehend them.”

As we review yet another version of the proposed Natick Solar buffer plan, digest yet another staff memo and try to reconcile new approval conditions with old ones; I am beginning to think that our best expert witness might be Penn & Teller.

I expect none of us imagined we would still be meeting on this topic more than two years after our neighborhood first learned about Mr. Rossi’s plan for his property. To be honest, way back then, none of us in the community thought a project so unfit for our neighborhood would ever be approved. Surely, its radical inappropriateness would be writ so large that you, as the body charged with the overall stewardship of sound planning for our city our would not allow it to go forward. But it did go forward, on a tight (and rather strange) single vote margin.

Still, we did our part, showing up and taking the process seriously, understanding (as some of us did and others of us would soon learn) that our city council had already and fatefully opened the door by allowing a developer-driven change to our code to happen. It was a sizeable betrayal by those we elected-one best measured by its full reversal in the wake of the mistakes made on projects further to our west and the outrage over the Natick approval.

I and others were -and remain- personally grateful for the Commission’s conditions of Master Plan approval. They reflected many – albeit not all-of the concerns raised by our community. Along with Dan Zevon, I gladly served on the Advisory Committee, working to turn the Applicant’s original response-a stockade fence-into an actual response to your first condition, to “develop and effective buffering plan.” Had you not created this committee and required an independent professional, I am pretty sure we would not even have a fence being proposed today.

Have we succeeded at your assigned task? No, we have not. But that is not a surprise. You can’t hide an elephant behind a Volkswagen.

What we can do, however is remember that an applicant –any applicant – by the very action of applying, is at the mercy of the body that holds the right to give permission. This project is a by-right development. But that does not mean it is “by-right by any means.”

Your original conditions of approval-some of them now met by simple passage of time or by the straightforward passage of the project through the city and state oversight processes-remain critical to us in the neighborhood.

In addition to your major first condition (landscape buffer effectiveness) discussed above, blasting (your condition 7), well conditions (your condition 10) and utilities coordination (your condition 9) all remain of tremendous concern today.

We have learned (from both the January and February staff memos) that even though the staff initially recommended retaining conditions 7 and 10; the Applicant does not wish to do so.

Regarding Condition 7, the Applicant is suddenly confident that the grade changes cannot be accomplished without blasting. Surely, a professional engineering firm would have been able to say this two years ago. And wouldn't the need for blasting be a significant carry cost for financing? Are we truly to believe that until just recently the Applicant was unsure of the need to blast? And well-testing (Condition 10, and one directly related to blasting) is now considered out of possibility. Suddenly?

Then we have Condition 9: utilities. Based on disastrous interconnection outcomes at another of the Applicant's Cranston installations, Staff has wisely enhanced your original condition by also recommending undergrounding of all on-site electric (indeed, that conversation was being had at the time the advisory committee was meeting and trying to address effective screening). Suddenly, this too is impossible. The blame is being placed at the feet of National Grid. Their process is described as so vague and onerous one might mistake them for a mom and pop enterprise, rather than an international energy giant. Again, the applicant has had TWO YEARS to establish a plan. What happened? National Grid has had an interconnect plan on the books since at least early December of 2019 (when it was submitted as part of the Applicant's RIDEM application for approval).

And speaking of approvals, during the two years since this project began, many different versions of the project plans have been circulated. So many, in fact, that staff constantly need to reference which set has been seen by which body, which approval applied when and to which version. I find this confusing.

I grew up in a world of architects and engineers-in many ways a latch-key kid of site offices, tackling homework at the edge of a drafting table and sometimes under one. Among the many things I learned by osmosis was that projects changed along their way-usually for the better, often at cost but always with a consistent set of plans whose updates were noted, dated and clearly delineated. The plans followed the passage of the project. Period.

While I no longer have a drafting board to spread out on, my dining room is a calamity of full plan sets and landscape pages. Comparing them is worse than sliding the blocks on a rubik's cube. Why does a site development page say "selective tree removal" but the landscape page says nothing about that. Isn't that important to the success of a buffer plan? Why is there a graveled area running north/south that is sometimes called a "path" and other times an "access road" or a "drive?" How do you (or any entity) know what you are approving if things are not consistent at each stage? For example, if we are now facing three-phase electric poles on the site, how can the current landscape proposal be evaluated for its effectiveness? Do we not need to see those poles on the drawing? Do we not need to design to them? Shouldn't all approvals be looking at the same data?

My particular childhood experience aside, my neighbors and I are lay-people. We need to rely on you and the power of your individual and shared commission to make sure that this project is executed to the highest possible standard. Right now, it's messy-there is not other word for it. And messy rarely leads to a tidy outcome.

As I write this, I face Natick Ave from my dining room table. Beyond it, I see the snow-covered slope where panels are projected to be built. Earlier this morning, as I fed our sheep, I looked across at another section of that snow-covered slope where panels are projected to be built. And, in a little while, when I carry a thermos of coffee up to my husband's studio, I will walk along yet another view of that snow-covered slope where panels are projected to be built. There is no proposed screening for any of those locations. None.

Please clean up this mess. Please look long and hard at the impacts of this project. Please think openly. Please continue to ask questions. Within the lot that holds the current project leasehold, surely there are better locations for this project-locations that could reduce (possibly remove) the need to blast. Locations that could allow retention of existing woodland, leaving a true buffer with the many, many project abutters. Ask why this project is being forced onto the most difficult and costly part of the lot?

*"Illusion is nothing more than the exploitation of gaps in human perception."*

Respectfully,

Drake Patten  
Hurricane Hill Farm