

0.4 MW AC Principal Solar Energy System

**'Sharpe Drive Solar'
Development Plan Review
and
Major Land Development Project**

**Sharpe Drive
Assessor's Plat 13 - Lot 47**

Prepared for: Sharpe Solar, LLC

Prepared by: Pimentel Consulting, Inc.

30 June 2023

INTRODUCTORY STATEMENT

Sharpe Solar, LLC ("Applicant") has retained the professional land use planning and zoning consulting services of Pimentel Consulting, Inc. ("Consultant"), in order to evaluate the appropriateness of introducing a rather innocuous 0.4 MW AC solar facility installation. However, what renders the subject proposal even more appropriate is that it is literally in accord with very recent Comprehensive Plan and zoning amendments that limit by-right solar facilities to industrially zoned properties, otherwise identified as 'Principal Solar Energy Systems' ("Principal SES").

a. Key Strategies 'Renewable Energy Production and Consumption' - *"Ground-mounted solar power facilities are a main type of renewable energy production, and it is **encouraged that the Zoning Ordinance allow this type of renewable energy production within the City's industrial zones.**" [Land Use Plan Element - Pages 21 - 23]*

Principal SES developments are defined as Major Land Development Projects ("Major LDP"), necessitating formal Planning Commission review and approval, in addition to necessitating Development Plan Review ("DPR") from the respective administrative DPR Commission. It needs to be reemphasized that the proposed rather de minimus solar installation is permitted as a matter-of-right. The Principal SES development will not only avert property disturbance (tree removal), given existing property conditions, but also appropriately located amidst an area predominantly improved with heavy commercial and light industrial land uses. The development will assist the City of Cranston in furthering their contribution to clean renewable energy, and in a manner that now addresses local concerns by averting residential disturbance.

The proposed Principal SES will realize provision of clean, efficient and affordable energy (both locally and regionally), in furtherance of the respective recently amended City of Cranston Comprehensive Plan and Zoning Ordinance regulations, in addition to State Energy Plan goals and objectives. It will also contribute to the economic well-being of the community by introducing a new tax generating stream, which unlike other utilities, averts any negative concerns, such as may be associated with the introduction of wind turbines. Furthermore, the proposal should be carefully considered given the environmentally sensitive nature of the subject property.

In light of the referenced Principal SES development, this land use consultant has conducted a thorough analysis of the respective application, site plan and supporting project materials, as well as the following regulatory documents:

- o City of Cranston Comprehensive Plan - June 2012 Amendment, to include recent Solar Facility Amendments ("Comprehensive Plan");

- o City of Cranston, Rhode Island, Zoning Ordinance, to include recent Solar Energy System Ordinance Amendment ("Ordinance");
- o Land Development and Subdivision Regulations ("Development Regulations");
- o State Guide Plan Element Report No. 120 - Energy 2035 - Rhode Island State Energy Plan - Approved 8 October 2015 ("State Energy Plan");
- o RI Comprehensive Planning Standards Guidance Handbook Series - Guidance Handbook No. 9 - Planning for Energy - Revised June, 2018 ("Energy Guidance Handbook");
- o RI Comprehensive Planning Standards Manual - Revised 12 August 2021 ("Standards Manual") and,
- o Reviewing pertinent Rhode Island General Law ("RIGL") and case law.

In addition, a general analysis of the immediate neighborhood has been conducted, for purposes of evidencing neighborhood compatibility. The purpose for the subject analysis is two-fold: (1) Evaluate the appropriateness of the proposed Principal SES development, in light of the recently amended solar facility installation 'standards'; and, (2) Render a professional opinion on the 'consistency' of the overall proposal with the recently amended Comprehensive Plan goals and objectives.

GENERAL PROPERTY DESCRIPTION

The property that is the focus of the Principal SES development is addressed 0 Sharpe Drive, further described as Assessor's Plat 13, Lot 47, and containing approximately 50-acres of total land area ("Property"). The Property is surrounded by a combination heavy commercial and light industrial land uses, in addition to the Pawtuxet River which bounds along the southerly and easterly sides. In fact, the Property is presently under the ownership of the Pawtuxet River Authority. Although constrained by on-site wetlands and contaminated soils (as evidenced by the recorded ELUR), the Property is nevertheless comprised of predominantly 'upland' land resources, upwards of 30-acres (60%). The Property, which is accessed from Ross Simons Road, a gravel driveway directly off of Sharpe Drive, was previously improved with an assortment of greenhouses, having since been removed and leaving it entirely unimproved. Finally, and most pertinent, is the already present site disturbance, having been extensively cleared of all vegetation. This contributes to development appropriateness, averting any tree removal as is the customary consternation associated with solar facility installations. Limited site activity is also directly resulting from documented site constraints, diverting viable land usage albeit industrially zoned; failing to contribute in an all important economically reasonable manner.

Another pertinent point is the proximity of the Pawtuxet River and Interstate-95 along the rear, southerly property boundary. The referenced abutting site conditions, in addition to surrounding non-residential land uses, all but extinguish the singular concern that appears to always cause solar consternation, namely perceived visual intrusion. Although the Property has been severely devoid of any vegetation, there is still the presence of a sufficient visual barrier, albeit unnecessary pursuant to the amended zoning regulations. The following personally obtained photographs detail present perimeter vegetation.

View looking south towards the Property, at the Ross Simons Drive cul-de-sac; Evidencing the present thick vegetative perimeter.



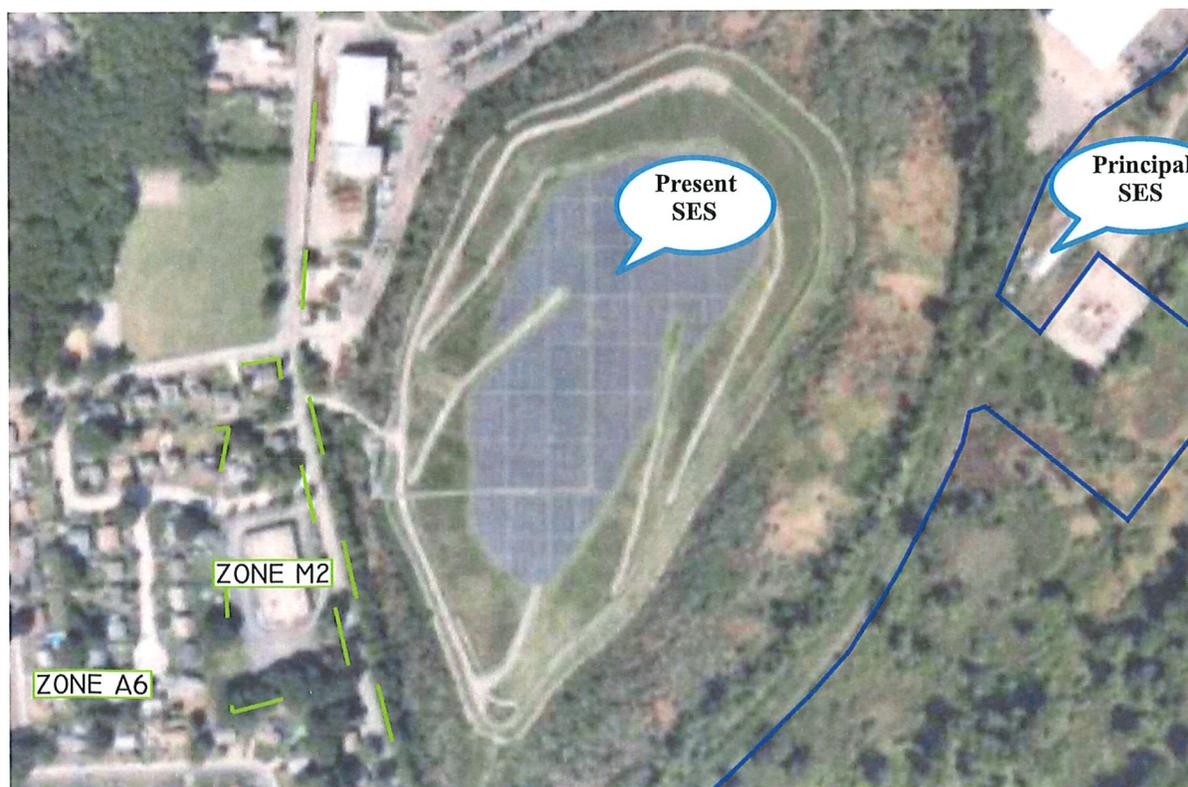
View from the adjacent industrial business to the north. Once again, evidencing the present thick vegetative perimeter.



View from the intersection of Pontiac Avenue and Knight Street, looking northeast in the direction of the proposed solar installation. The approximate distance is in excess of 1,800 linear feet.

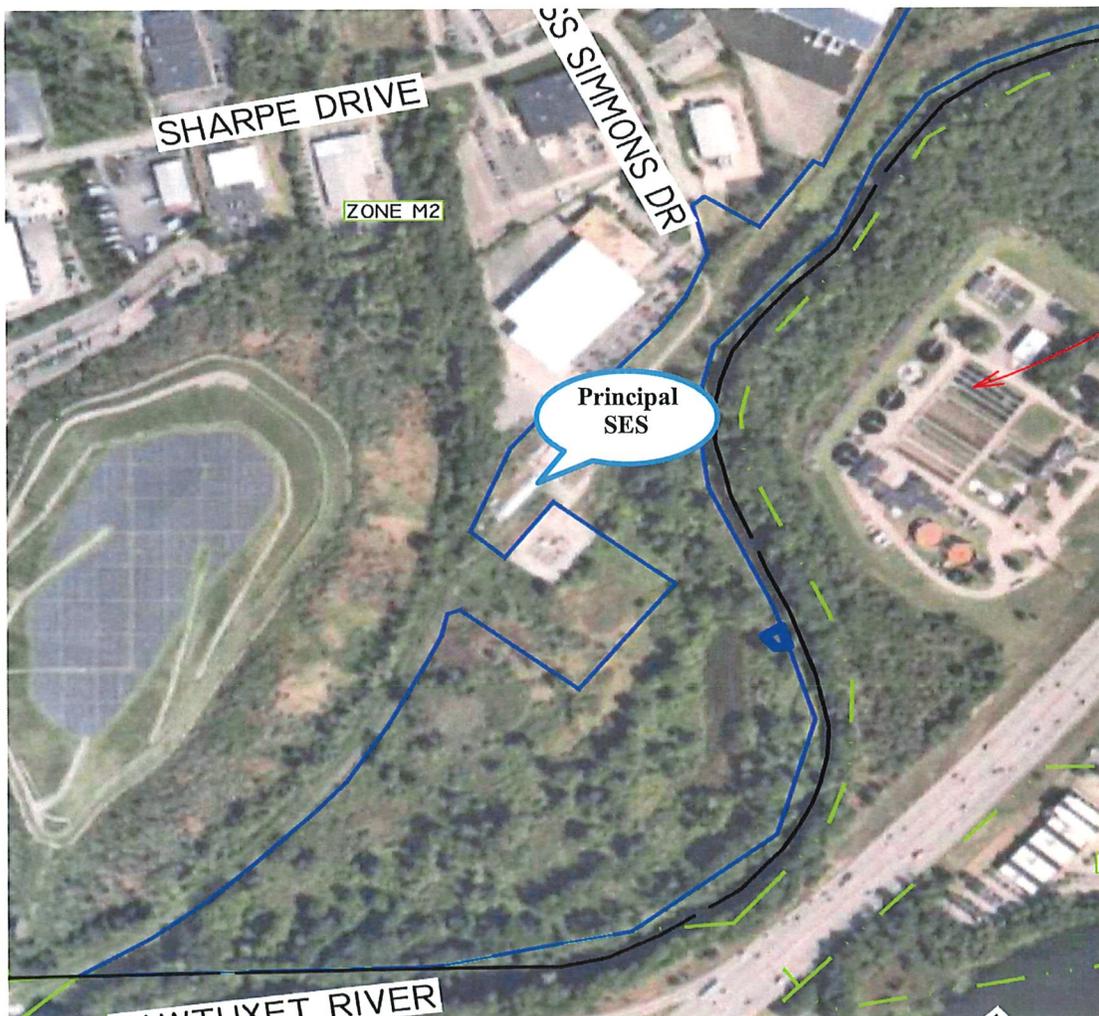


Perhaps the most pertinent point evidencing development appropriateness, is the fact that there is already a quite sizable solar facility installation situated to the immediate west of the Property. In fact, the referenced solar energy system is situated directly between the residential neighborhood(s) to the west (albeit some distance) and the proposed de minimus installation. The following images, excerpted from the Applicant's submission package [Credit: DiPrete Engineering] and personally obtained photograph, respectively, detail this very important fact.





Once again, there are no constraints to introducing the proposed solar facility system. Furthermore, considering the Property is constrained by both both on-site (contaminated soil) considerations and sensitive site features, to include the proximate Pawtuxet River and resulting wetlands, a passive environmentally sound solar facility installation is the most appropriate usage of the Property. In addition to perimeter vegetation and regulatory setbacks, all safeguard measures will be properly instituted, to include security fencing, thereby averting any negative impact. The property is illustrated below, as excerpted from the Applicant's submission package [Credit: DiPrete Engineering].



The property is presently zoned in a 'General Industry' District ("M-2 District"). Present zoning is illustrated below, as excerpted from the City's GIS. As detailed below, the entire area is similarly zoned in an industrial manner, with the nearest residential neighborhood being situated upwards of one-third of a mile distance to the west; numerous commercial and industrial entities situated in-between. This is a vitally important point because of the joint fact that there are few properly zoned properties and even fewer that are appropriately distanced from specified dissimilar land uses.

Property and Area: Zoning Designations - Detailing the large swath of industrially zoned properties, and great separation from the residential neighborhood to the west.



Another vital point, and perhaps the most important consideration given the express purpose for the new solar ordinance, is limiting by-right solar facility installations to those areas that are industrially zoned. In other words, purposefully limiting solar facility installations to a select few properties, inclusive of the Property. In addition to the industrial area situated between

Plainfield Pike and Scituate Avenue, and a select few sporadic sites, the area in which the Property is located is by far the most industrially congested community-wide. The referenced zoning map, displayed below [Credit: Cranston GIS], is presented for purposes of corroborating this Consultant's determination on amended solar regulatory consistency and solar facility development appropriateness.

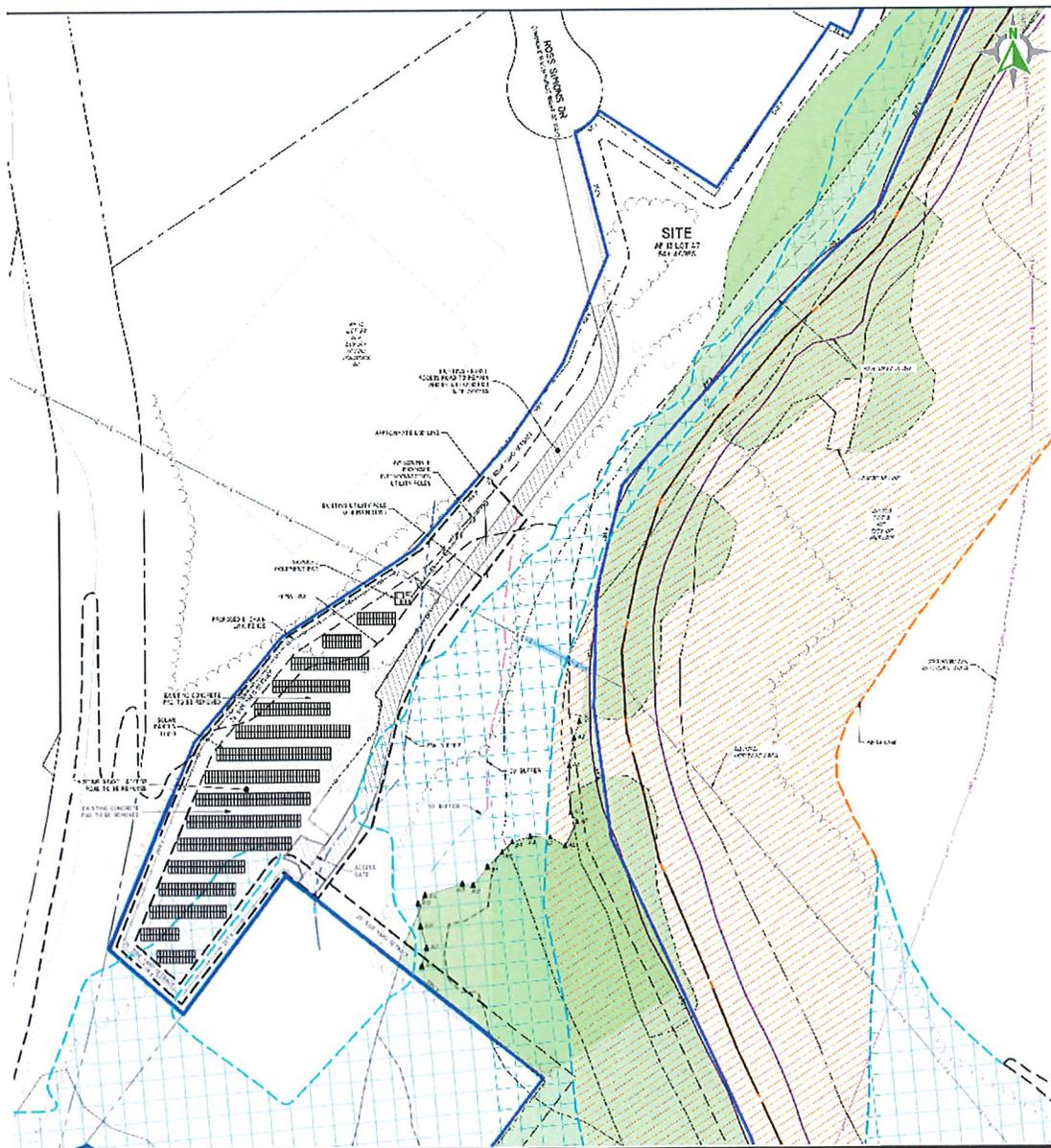


GENERAL 'SOLAR POWER' DEVELOPMENT PROPOSAL

The Applicant seeks to introduce a rather insignificant 0.4 MW AC 'Principal SES'. This is perhaps the smallest solar installation that this Consultant has ever been requested to review for regulatory consistency purposes. This Consultant has been engaged in the review of over three-dozen principal solar installations, the smallest being approximately two (2) megawatts. Therefore, the size of the proposed Principal SES in comparison to the overall parcel, already evidences site appropriateness. This is only cemented by the fact that the amended solar ordinance solely permits by-right installations within industrially zoned properties. This is likewise in direct accord with the recently amended Comprehensive Plan [Goals and Policies Statement - Page 14].

NRP-1.9: "Encourage the development of renewable energy facilities in appropriate locations such as rooftops, parking lots and in industrial zones rather than on green space or residential zones to protect the City's natural resources and character."

The proposed solar facility proper will occupy but a fraction of the overall Property. The Property contains upwards of 50-acres, of which approximately 30-acres is deemed 'upland' resources. The proposed installation will occupy approximately 2.40-acres; solar panels and interrow spacing merely consuming one-acre. Therefore, the solar facility will occupy but a mere 4.8%, and solar-array installation proper a mere one-percent of the overall Property. Furthermore, the solar facility installation is being limited to the area already disturbed and encumbered, thereby necessitating little, if any, vegetative clear cutting. This land use consultant is well aware of just how important it is to minimize tree clearing, visual intrusion being the sole concern associated with the respective land use. Finally, and perhaps most importantly, is presence of any residences, nearest residential neighborhood being upwards of one-third of a mile distance. The proposed solar facility installation and surrounding neighborhood conditions are illustrated below and on the following page, as excerpted from the Applicant's site plan package [Credit: DiPrete Engineering] and City's GIS, respectively.





COMPREHENSIVE PLAN CONSISTENCY ANALYSIS

There was a very recent Zoning Ordinance and associated Comprehensive Community Plan language amendment addressing solar facility growth, limiting them as a matter-of-right to industrial sites. Therefore what can be expressly extracted from these amendments, is the community's desire to still assist in addressing the state's renewable energy aspirations, while doing so in a manner that precludes residential presence; there now being an aversion to solar installations amidst residential neighborhoods.

a. Key Strategies 'Renewable Energy Production and Consumption' - "...The Zoning Ordinance should permit the development of renewable energy production facilities in

M-1 & M-2 zoning districts, and should promote the development of multiple renewable energy production facilities within the City... [Land Use Plan Element - Pages 21 - 23]

Comprehensive Plan composition is regulated by the various State Guide Plan and other Regulatory Documents, approved by the State Planning Council. The State Guide Plan in question would be the State Energy Plan. The overall goal of the State Energy Plan is to realize provision of cleaner, more efficient energy, to meet the need of residents and business community alike. This includes all renewables, such as wind, solar, and hydro, as well as more efficient non-renewables, given the understanding that an effective statewide energy program must be dependent upon and inclusive of a variety of sources. This statewide directive, downward directed to the individual municipalities, is to carefully consider all energy proposals. However, regulatory standards have changed, resulting from a public revolt against solar facility development in residential districts.

Energy Guidance Handbook

Standard 9.2.b - *"Include implementation actions within the Implementation Program that address:"* [Page 9]

"Adopting zoning policies and siting standards for renewable energy production facilities." [Page 10]

"It is important that local zoning ordinances address renewable energy production facilities. To provide clarity to the development process, zoning ordinances must include identification of which types of renewable energy production facilities will be allowed within the municipality, whether it be within specific zoning districts, or for the municipality as a whole. Additionally, when appropriate, zoning ordinances may include siting standards for allowed renewable energy production facilities in order to dictate the placement and size of the facilities within a property." [Page 10]

"The main renewable energy production facility types that municipalities are likely to encounter are solar and wind, and, to a lesser extent, hydropower and anaerobic digestion. Municipal ordinances should consider all of the various types of renewable energy production facilities, in which districts they may be appropriate and what dimensional constraints might be reasonable." [Page 10]

*"To develop appropriate zoning policies and siting standards, municipalities should undertake community discussion on the topic and assess what types of renewable energy are appropriate for which contexts. **The goal of such discussions should be to determine an appropriate framework for the development of renewable energy production facilities that maximizes the benefits to the community and reduces potential impacts on neighbors.**"* [Page 10]

"When considering which actions may be appropriate for your municipality, consider the following guiding questions:" [Pages 10 - 11]

- *"What siting standards should the municipality place on renewable energy production facilities to minimize impacts to surrounding properties?"*

- **"Amend the zoning ordinance to allow specific renewable energy production facilities within appropriate zoning districts."**
- **"Establish as-of-right or special use zoning for renewable energy production facilities in appropriate areas."**

Recommendation 9.4 - "Include implementation actions within the Implementation Program that address: Enabling the development of renewable energy production facilities by the private sector." [Page 14]

It is clear from the preceding statewide directives why the quite recently adopted Comprehensive Plan language, in support of the similarly necessary Ordinance regulatory standards, is so focused on alternative energy 'need' and 'production'. A thorough and careful review of the amended Comprehensive Plan can only lead to one conclusion, namely that there are neither concerns nor considerations that would preclude usage of the industrially zoned Property for solar facility installation purposes. Especially considering the rather de minimus size of the proposed solar facility and limited number of town-wide properties that are otherwise deemed appropriate from both a regulatory and siting perspective. This is evidenced by the following newly adopted Comprehensive Plan language.

No. 1 'Green and Environmental Systems Meeting' - Top Issues and Improvements Needed - Water / Air Quality: **"Preserve existing forests, farmland, and open space from solar development by restricting solar development to developed commercial and industrial areas."** [Page 2.9]

B. 'Findings and Challenges' - Challenges: **"Developing local solar siting policy that focuses on existing developed commercial & industrial areas with large parking lots and rooftops."** [Page 11.3]

D. 'Current Conditions'

1. Energy and Resource Use - Renewable Energy - Solar Use: **"Upon observing three solar facilities which have been installed via the zoning amendment process (RIGL 45-24-51), and through the course of developing solar policy, there is a clear public consensus to focus solar arrays within existing developed commercial & industrial areas – perhaps through accessory use solar canopies and rooftop solar. Preserving existing, undeveloped forest tracts, whether by open space preservation, or in concert with residential zoning districts parameters, is preferred."** [Page 11.6]

The sole discrepancy is in regard to the present land use classification pursuant to the Comprehensive Plan - Future Land Use Map ("FLUM"), which acknowledges that the Property is presently classified in an Open Space manner. However, this does not refute this Consultant's determination on Comprehensive Plan consistency, considering RIGL is adamantly clear on this issue. Whenever there is disagreement between a land use classification and zoning designation, a property owner has the absolute right to rely on the latter, as evidenced by RIGL 45-22.2-13(c) 'Compliance and Implementation'.

§ 45-22.2-13(c) Compliance and implementation - *“Each municipality shall amend its zoning ordinance and map to conform to the comprehensive plan in accordance with the implementation program as required by § 45-22.2-6(b)(11) and § 45-22.2-6(b)(12)(iv). The zoning ordinance and map in effect at the time of plan adoption shall remain in force until amended. In instances where the zoning ordinance is in conflict with an adopted comprehensive plan, the zoning ordinance in effect at the time of the comprehensive plan adoption shall direct municipal land use decisions until such time as the zoning ordinance is amended to achieve consistency with the comprehensive plan and its implementation schedule. In instances of uncertainty in the internal construction or application of any section of the zoning ordinance or map, the ordinance or map shall be construed in a manner that will further the implementation of, and not be contrary to, the goals and policies and applicable content of the adopted comprehensive plan.”*

Once again, a solar installation will have little to no disturbance or negative impact on the overall industrial character of the surrounding neighborhood. The proposed Principal SES development necessitates minimal infrastructural improvements, and instead of depleting, will in fact contribute economically, by establishing an additional revenue stream.

ZONING ORDINANCE REGULATORY ANALYSIS
SOLAR ENERGY SYSTEMS - DEVELOPMENT PLAN REVIEW STANDARDS

Albeit the proposed Principal SES is permitted as a matter-of-right, it nevertheless necessitates DPR and Major LDP approval. The DPR regulations are addressed first, followed by the Major LDP ‘standards’ of approval. The Applicant must enter evidence into the record satisfying the requisite standards for the granting of the DPR. The standards for the granting of the DPR are clearly outlined in Section 17.24.020.F. The stated standards are discussed individually in greater specificity below.

Section 17.24.020.F ‘Solar Energy Systems - General requirements’:

(1) Location

a. *“SESs shall be allowed under zoning in accordance with the Cranston City Code Use Table, Section 17.20.030.”*

Use Table

‘Principal SES’ - Permitted by Right within the M-2 District.

b. *“SESs shall not be allowed on land held under conservation easement or land for which the development rights have been sold, transferred, or otherwise removed from the parcel, unless the conditions of the easement, deed or other applicable legal document specifically allows for such facility.”*

Investigated and evidenced that there are no such encumbrances. Therefore not applicable.

c. "SES panels and equipment shall, to the greatest extent possible, be sited within the project site in the area(s) which are anticipated to minimize potentially adverse impacts to nearby properties, communities and natural resources with reasonable considerations to site conditions and other use(s) on site as applicable."

The area of the proposed Principal SES is already disturbed, averting tree removal. Regardless, the perimeter will remain vegetated, minimizing visual intrusion. However this is unnecessary, considering the amended regulations does not necessitate any screening when appropriately separated from residences or any other dissimilar land use. Otherwise, there are no site conditions that would preclude introduction of the proposed Principal SES.

(2) Building Permit and Inspection - "No SES shall be constructed, installed, or modified without first obtaining a building permit and such facility shall be subject to periodic inspections as deemed necessary by the building official and/or electrical inspector."

Compliance will be achieved subsequent to attaining DPR and Major LDP review and approval.

(3) Height

a. "Roof-mounted and building-integrated SESs are exempt from building height regulations."

Not applicable.

b. "No solar canopy shall exceed the height limitation of the zoning district on which the SES which it is located."

Not applicable, ground-mounted system proposed.

c. "No individual panel within a ground-mounted SES shall exceed twelve (12) feet in height. The approving body may grant relief from this requirement at its discretion should uses(s) be proposed underneath the panels which are allowed under zoning and are compatible and appropriate uses on the site."

Solar array panels will not exceed 12-feet in overall height.

(4) Solar Lot Coverage.

a. Definition - "The amount of upland area allowed to be occupied by ground-mounted solar panels and associated equipment, exclusive of fencing, but inclusive of inter-row and panel spacing. Solar lot coverage is calculated entirely separately from building lot coverage, as defined by the Cranston City Code, as amended."

b. Applicability - "Solar lot coverage applies to all major accessory and principal SESs. This section shall not apply to minor accessory SESs."

c. "The solar lot coverage of all ground-mounted SESs are as follows: Principal SES maximum lot coverage is 85%."

Merely considering 'upland' land resources: The maximum solar facility installation coverage will approach 8.00%. The maximum solar panel array with interrow coverage will approach approximately 3.34%.

5. Setbacks.

a. *"All roof-mounted and building integrated SESs are exempt from building setbacks so long as they do not encroach into any setback beyond the building on which they are proposed."*

Not applicable.

b. *"Solar canopies and ground-mounted minor accessory SESs shall be setback a minimum the setback requirements of the applicable zoning district. The setbacks for accessory structures/buildings in city code Section 17.60.010 shall not apply."*

Not applicable

c. *"All major accessory SESs in nonresidential zones and principal SESs in M-1 and M-2 zones including electrical equipment shall comply with the setback requirements of the applicable zoning district, or the distance necessary to accommodate required visual screening, whichever is greater, as determined by the approving body(s)."*

The proposed installation will realize full setback compliance. Regardless, there are no dissimilar land uses within proximate distance necessitating increased separation.

6. Visual Screening/Buffering.

a. **Applicability** - *"This section applies to major accessory and principal SESs. This section shall not apply to minor accessory SESs."*

b. **Longevity** - *"Required visual screening shall be maintained for the life of the SES. The property owner and/or facility owner shall be required to replant any section of the buffer/screening found not to meet the requirements of this section as determined by the city zoning official."*

c. M-1 and M-2 Zones.

i. *"To incentivize SESs in M-1 and M-2 zones, no additional visual screening will be required unless the project abuts an incompatible use or a residential zone."*

The Property is properly zoned in a M-2 District manner and neither abuts a residential zone or any incompatible land use.

ii. *"Where a project abuts incompatible use or a residential zone, the applicant shall use an inclusive approach with the abutters within four hundred (400) feet of the project site to develop an effective visual screening plan. Buffer depth requirements will be flexible as to an appropriate extent based on site conditions while still achieving effective visual screening. Where appropriate, stockade fencing shall be used to satisfy the screening"*

where the existing screening is insufficient. The materials and aesthetics of the stockade fence shall be a topic to be addressed as part of the inclusive approach, and may be conditioned by the approving body. A stockade fence alone will not suffice for visual screening, from the right-of way or abutting properties plantings shall be required in between the project fencing and the property lines as determined during the inclusive approach."

Not applicable. Nevertheless will be properly fenced, and on-site perimeter vegetation maintained to the extent feasible in a naturally mature state.

iii. "The plan commission may require an independent review of the visual screening/buffering plan as by a Rhode Island registered landscape architect in accordance with the city of Cranston Subdivision Regulations, as amended."

Applicant understands and is prepared to realize full compliance.

7. Fencing.

a. Applicability - *"This section shall apply to all major accessory and principal SESs. This section shall not apply minor accessory SESs."*

b. *"The applicant shall be required to install a minimum of an eight-foot fence around the perimeter of all ground-mounted SESs. In instances where the applicant can show that the surrounding area and site do not require fencing for protection or trespass, or to allow agricultural production within the array area, the planning board may waive the fencing requirements."*

Fencing will be provided to assure site security; referenced fencing to be eight-feet in overall height

c. *"Barbed wire, razor or anything similar is prohibited."*

Compliant.

d. *"Where chain-link fencing is allowed, it must be black vinyl-coated."*

Compliant.

Items 8 through 17 are site design standards, to include stormwater, soils, manufacturing / installation, and eventual decommissioning / reforestation plan, all of which will be addressed by the respective expert(s), most notably DiPrete Engineering.

MAJOR LAND DEVELOPMENT REGULATIONS
GENERAL REQUIREMENTS ANALYSIS

The proposed Principal SES installation is defined as a Major LDP, thereby necessitating satisfying the requisite 'standards' of review to the satisfaction of the Planning Commission.

Section III.H 'Required Findings' of the Cranston LD Regulations, and RIGL 45-23-60 - *"The requirements listed below shall be applicable to all subdivisions and land developments submitted for approval, unless otherwise specifically provided. Prior to final approval or any subdivision of land development project regulated herein, the Commission, or unless otherwise designated by the Commission, the Administrative Officer shall address the general purposes cited in RIGL 45-23-30 and Section 1(c) of these regulations and shall make positive findings on all of the standards listed below for the project record."*

1. *"Each subdivision or land development project shall be consistent with the requirements of the City of Cranston Comprehensive Plan or shall satisfactorily address the issues where there may be inconsistencies."*

A thorough review of the Comprehensive Plan, particularly amended language pertaining to solar facility installations, evidences absolute textual 'consistency.' The proposed development will neither alter the general character of the surrounding industrial area or impair the intent or purpose of either the Ordinance or Comprehensive Plan.

2. *"For subdivisions, each lot shall conform to the standards and provisions of the Cranston Zoning Ordinance..."*

Although no subdivision is proposed, evidencing Zoning Ordinance compliance is nevertheless required. The proposed Principal SES will realize full zoning compliance with the amended solar ordinance as evidenced throughout this report.

3. *"There will be no significant negative environmental impacts from the proposed development as shown on the final plan, with all required conditions for approval."*

The vast majority of the Property is already disturbed, permitting solar facility installation with little need for any vegetative clearing. A solar facility installation does not necessitate any infrastructure, thereby averting any site, neighborhood or community impact. The Property does have some environmental constraints, as evidenced by the recorded ELUR, but will be entirely avoided. In fact, the present site constraints preclude reasonable economic land usage, albeit zoned in an industrial manner, thereby further solar installation appropriateness.

4. *"The subdivision as proposed will not result in the creation of individual lots with such physical constraints to development that building on those lots according to pertinent regulations and building standards would be impracticable."*

Once again, no actual subdivision is proposed. Regardless, this Consultant assures the Planning Commission that there are no constraints to introducing a solar facility installation. In

fact, the proposed land use does not necessitate any infrastructure, as would be the norm in regard to a true industrial and/or heavy commercial entity.

5. *"All proposed land developments and all subdivision lots shall have adequate and permanent physical access to a public street."*

The Principal SES will continue to be physically accessed via a 16-foot wide gravel driveway off of Ross Simon Drive, which is directly connected to Sharpe Drive.

6. *"Each subdivision and land development project shall provide for safe and adequate local circulation of pedestrian and vehicular through traffic, for adequate surface water run-off, for suitable building sites, and for preservation of natural, historical, or cultural features that contribute to the attractiveness of the community."*

7. *"The design and location of streets, building lots, utilities, drainage improvements and other improvements in each subdivision shall minimize flooding and soil erosion."*

Expert testimony will be provided addressing each of the respective design elements. Needless to say, solar facility developments require few, if any, resources, and are therefore the most respectful of the environment and constraining site conditions. Regardless, it needs reemphasizing that there are neither residential or dissimilar land uses within proximate distance of the Property. Finally, it should also be noted that the proposed development will be fully compliant with all respective solar installation performance standards pursuant to Section 17.24.020, inclusive of site preparation, lighting, and noise.

CONCLUSION

It is the professional opinion of this Consultant that the proposed Principal SES development is most appropriate, particularly considering it now averts any residential disturbance in accordance with the amended Zoning Ordinance and Comprehensive Plan solar facility regulations. The City of Cranston Planning Commission and DPR Commission should therefore not have any reservation in issuing affirmative decision(s).