



2023 July 10
Cranston Planning Commission
869 Park Avenue
Cranston RI 02910

Dear Commissioners,

The West Bay Land Trust submits the following comments on the application for the Sharpe Drive Solar proposal. The proposal is the first to be submitted under the new solar ordinance and involves land designated as open space on the Future Land Use Map. These facts raise several issues that the Commission should consider. It is imperative that this application set the standard for future applications.

First, the solar ordinance states:

“A copy of the Preliminary Interconnection Feasibility Study from National Grid or the applicable utility company” is “required at the Master Plan stage.” 17.24.020(G)(1)

The study is defined as “indicating the anticipated route and associated costs for interconnection of a solar energy system to the electric distribution system.” 17.24.02 (C-21)

A copy of the pre-application report has been posted, but this report does not appear to meet the requirements of the ordinance. The report states that a cost estimate will be provided during the System Impact Study and does not indicate the anticipated route. Critically, “[t]his report shall not be used to infer the ability to interconnect any project to any of the existing Rhode Island Energy facilities.”

Has the preliminary study been completed? If not, then the July 11 hearing is premature and should be continued or postponed until such time as the study is available for review by the Commission and the public as required by the ordinance.

Second, the proposal brings into sharp relief the conflict between zoning classifications and the comprehensive plan, which identified “430 parcels of land which have been assigned a land use classification of Open Space are not appropriately zoned.” (p. 46) The plan recommended “that for land that is not owned by the City, and that is not already zoned open space, this land should only be zoned Open Space with the permission of the land owner.” (p. 43) Have city officials and the Pawtuxet River Authority ever discussed changing the zoning from M-1 to S-1? If not, why not?

The S-1 designation should be the appropriate designation given the PRA’s plans for the property. “The Authority has been steadily working to make this area a functional urban passive

recreation facility as well as a wildlife refuge.” (Annual report, 2021-2022, p. 6) Will the lease with Revity Energy/ Sharp Solar hinder the zoning change? The language in the Notice of Lease appears to do so. “The Lease also grants to Tenant certain access, utility, solar, and other easements over, under, and across: (i) all or a portion of the Remaining Landlord Property; and (ii) the Premises, in each case as further described in the Lease.” Under the lease, which has not been released, does the applicant have the right to expand the solar facility at a later date? Does this lease prevent the zoning change called for in the comprehensive plan for the life of the lease, potentially 40 years?

How does this application meet or compliment the following comprehensive plan goals:

LUP-1.4 Preserve and enhance the quality of existing valuable resources including wetlands, surface water, ground water, wildlife habitats and migration corridors, historic sites, scenic views and unique cultural resources.

LUP-8.2 Strengthen protection of open space corridors along major water bodies and wetlands by zoning them for Open Space.

LUP-8.3 Within 18 months of the Plan’s approval by the Rhode Island Department of Administration, bring the Zoning Ordinance into conformity with the Comprehensive Plan by rezoning lands to make the zoning map consistent with the Future Land Use Map.

OSP-1.1 Acquire lands along the rivers to ensure access to and protection of these natural resources.

Respectfully submitted on behalf of the WBLT,

Douglas Doe
President