

## City Planning Department



## Memo

To: Cranston City Plan Commission  
From: Joshua Berry, AICP, Senior Planner / Administrative Officer  
Date: December 31, 2020  
Re: "Natick Avenue Solar" Preliminary Plan – Major Land Development

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**Owner:** Ronald Rossi  
**Applicant:** Natick Solar, LLC  
**Location:** 0 Natick Ave, AP 22-3, Lot 108 & 119  
**Zone:** A-80 (single family dwellings on lots of minimum areas of 80,000 ft<sup>2</sup>)  
**FLU:** Single family residential less than 1 unit/acre

**Application materials can be found on the City website by clicking [here](#).**

### I. Permitting Process History

- Conditional Master Plan Approval was granted by the City Plan Commission on 2/5/19.
- An Insignificant Alteration to Freshwater Wetlands Permit was issued by RIDEM on 12/6/19.
- Pursuant to conditions of the Mast Plan approval, a professional Landscape Architect was hired by the City to review the landscape/buffering plans and an Advisory Committee was formed to provide input to the peer reviewer. The Committee met with the peer reviewer and applicant remotely on 8/25/20, 9/22/20, and 10/22/20.
- The Development Plan Review Committee (DPRC) met remotely and issued a Preliminary Plan approval on 11/18/20.
- The Conservation Commission reviewed the plans remotely at its 11/24/20 meeting.

Key documents related to these items can be found on the website link above in red.

### II. Proposal Summary

The applicant is proposing to develop, install and operate an approximate 6.25 MW AC (8.1 MW DC) ground-mounted solar energy installation on a 29.7-acre lease area within a 64-acre property in an A-80 zone. The remaining 34 +/- acres of the site are a hayfield/Christmas tree farm/woodland area and a wetland area, and are to remain as such. The project area is currently undeveloped forest with topography sloping towards

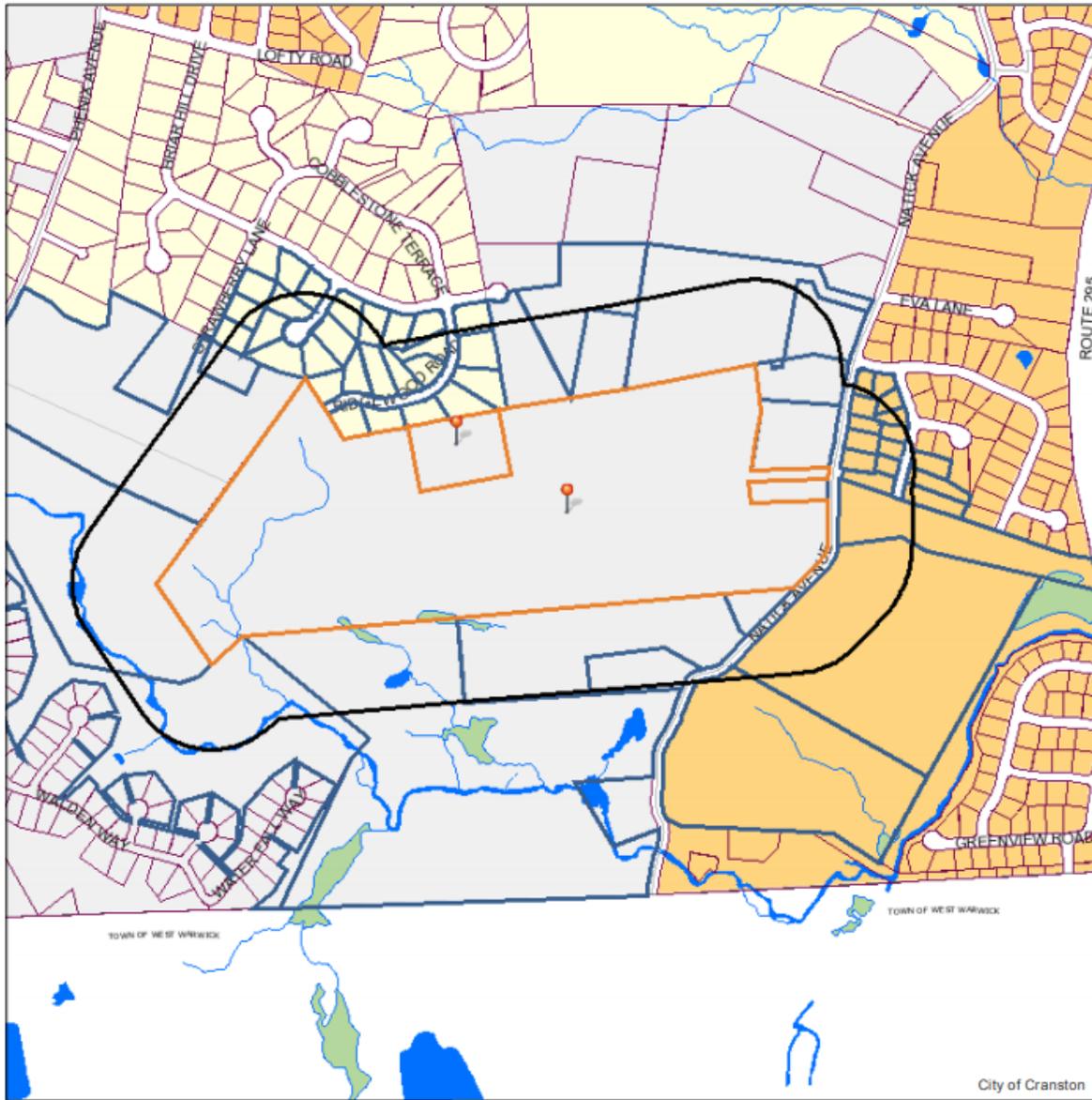
an existing wetland are in the southeast corner of the property. The proposal includes clearing and grading as necessary to install the ground mounted solar arrays, associated electrical equipment (inverters, switchgears and transformers), landscape areas, and the proposed roadway providing access to the solar installation. The proposal includes a buffer screening plan intended to mitigate visual impacts from residential properties.

### **III. Documents Which Are Part of the Application**

1. Signed Preliminary Plan application;
2. Check for the filing fee;
3. Project Narratives dated 12/28/20 from Senior Project Manager Dave Russo, P.E. from DiPrete Engineering;
4. Preliminary Plan checklist;
5. Stormwater Management Report prepared by Kevin Demers, P.E. of DiPrete Engineering dated 11/5/20;
6. Stormwater System Operation and Maintenance Plan prepared by Kevin Demers, P.E. of DiPrete Engineering dated 11/5/20;
7. Soil Erosion and Sediment Control Report prepared by Kevin Demers, P.E. of DiPrete Engineering dated 11/5/20;
8. RIDEM Wetlands Approval Letter signed by Nancy L. Freeman dated 12/6/19;
9. RIDEM approved plan set correlated to item #8;
10. 100' radius map and list of abutters;
11. Certificate of Municipal Liens for AP 22, Lots 108 & 119;
12. Preliminary Plan Submission plan entitled "Natick Avenue Solar" prepared by Kevin Demers, P.E, of DiPrete Engineering dated 12/2/20. The plan set includes a Class I Survey prepared by Robert G. Babcock, P.L.S. of DiPrete Engineering dated of 11/9/18; and
13. Landscaping Plans prepared by John C. Carter P.L.A. of John C. Carter & Co., INC. last revised 11/30/20.
14. Cut/Fill Exhibit imposed over the Site Development Plan (sheet 6 of 13) by Kevin Demers P.E. of DiPrete Engineering with a last revision date of 12/18/20.
15. Notarized Affidavit of Notice Compliance signed by Robert D. Murray.

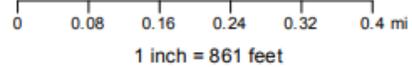


# City of Cranston Zoning Map



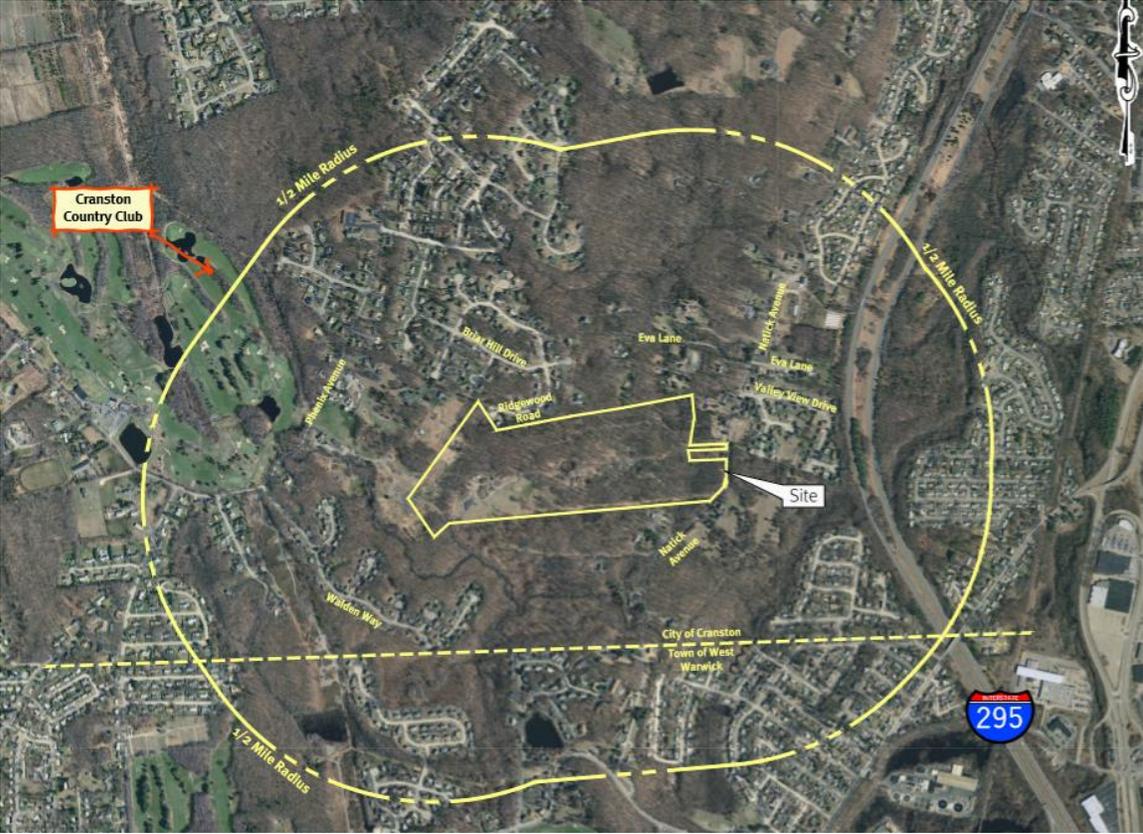
## Legend

Plat Bounds	<b>Zoning</b>	A8	C2	M2
Historic Overlay District	none	A6	C3	EI
Parcels	A80	B1	C4	MPD
Water Body	A20	B2	C5	S1
Streams/Rivers	A12	C1	M1	

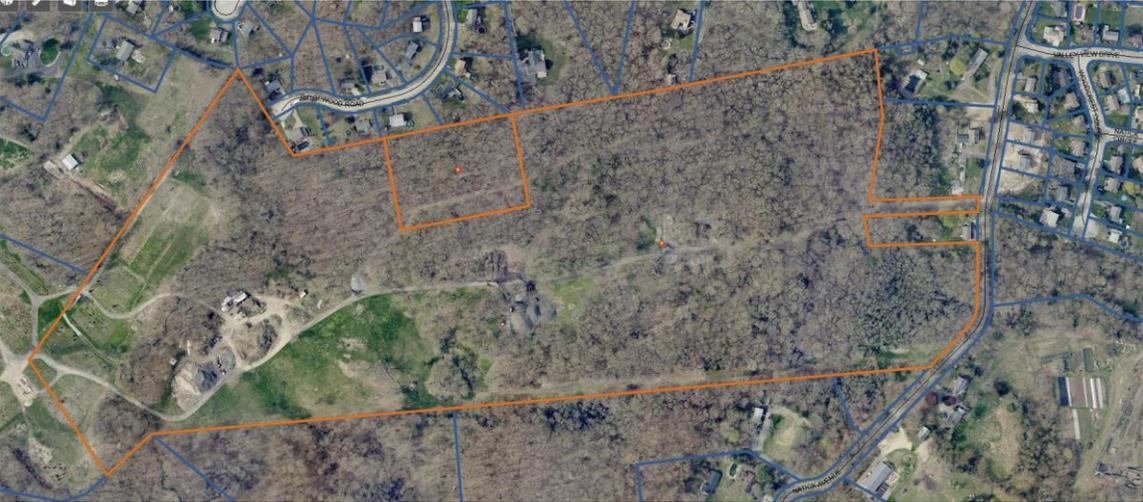


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**AERIAL VIEW (Showing 1/2 Mile Radius)**



**AERIAL VIEW (Close Up)**



**STREET VIEW** (Entrance @ Natick Ave – Summertime)



**VIEW ON NATICK AVE** (Facing North)



**VIEW ON NATICK AVE FACING WEST @ THE TGP**



#### **IV. Surrounding Land Use and Context**

Analysis using the City of Cranston Geographic Information System indicates that:

1. The site is zoned A-80 (single family dwellings on lots of minimum areas of 80,000 ft<sup>2</sup>). The two lots that comprise the total site (AP 22-3, Lots 108 & 119) are combined for zoning purposes per City Code Section 17.88.010. The majority of the parcels surrounding the property are also zoned A-80, though there are abutting A-20 lots off of Ridgewood Road to the north of the site towards its northwestern corner. The eastern side of Natick Ave is zoned A-8, although the 41.5 acres has been permanently preserved by the City of Cranston through the purchase of development rights.
2. The Future Land Use Map (FLUM) designates the site as Single Family Residential Less than 1 unit/acre. The proposed use was consistent with this designation at the time that the Master Plan application was certified complete. The City Code and Comprehensive Plan have since been amended as to no longer support/allow this use in A-80 zoning, but this application is grandfathered to the regulations in place at the time the Master Plan was certified complete.
3. The project site has frontage on the western side of Natick Avenue near the southern edge of the City. The two points of frontage on Natick Ave are split by AP 22-3 Lot 71 (an A-80 single family residence) which is situated just north of the wetland area labeled 'Parcel C' on the Site Plan. The smaller northern portion of the frontage is 50' wide and serves as the point of access to the property. There are two A-80 lots, AP 22-3 Lots 116 & 5, which are north of the site entrance, between Natick Avenue and the project site.
4. The portion of the site to be used for the solar project is undeveloped forestland. There are existing structures on the portion of the site to the west of the project which is proposed to remain.
5. There is a 50' gas easement owned by the Tennessee Gas Pipeline (TGP) that runs along the southern property line. There is currently no part of the proposed project that would violate this easement. The applicant is corresponding with TGP, is aware of TGP's requirements, and will be required to adhere to all applicable regulations and protocols regarding work in and/or around the easement.
6. The project site has considerable topography, sloping downward towards the southeast to the existing wetland area. The plan set includes an "Existing Conditions Plan" (sheet 4 of 13) which provides contour lines and highlights slopes greater than 15%.
7. There is wetland area in the southeast corner of the site. RIDEM has reviewed and approved the plans, having issued an Insignificant Alteration Permit on 12/6/19.

#### **V. City & Agency Comments**

Pursuant to RIGL 45-23-41 A3, these plans were distributed for comment to Veolia Water, PWSB, Public Works Department / Engineering Division, Building and Zoning Department, Conservation Commission, and the Fire Department. Responses are as follows:

1. **Veolia Water** – The development does not require public sewer utilities.

2. **Providence Water Supply Board** – The development does not require water supply.
3. **Department of Public Works / Engineering Division** – DPW reviewed the plans as part of the Development Plan Review Committee, which approved the plans on 11/18/20. Further review and correspondence with the applicant occurred in order to explore consistency with Master Plan Condition of Approval #7 (regarding grading and site work) and to better understand the project interconnection. After receiving the Cut-Fill Exhibit, the Department met with the Planning Department on December 30, 2020, and conveyed that they were satisfied with the proposal.
4. **Department of Public Works / Traffic Safety Division** – The Division reviewed the plans as part of the Development Plan Review Committee, which approved the plans on 11/18/20, and noting the lack of anticipated trip generation for this land use, had no issues with the proposal.
5. **Fire Department** – The Fire Department reviewed the plans as part of the Development Plan Review Committee, which approved the plans on 11/18/20. The Fire Department afterward provided comments that the ground-mounted system shall have a clear area of 10' and raised concern regarding the combustible nature of growth underneath the panels. Planning staff is concerned that disallowing growth underneath panels raises stormwater runoff and environmental concerns, and may be more restrictive than how the City regulates growth for any other land use in the City.
6. **Building and Inspections Department** – The Building & Inspections Department reviewed the plans as part of the Development Plan Review Committee, which approved the plans on 11/18/20. No other comments have been issued.
7. **Conservation Commission** – The Cranston Conservation Commission reviewed the plans at their 11/24/20 meeting. A letter dated 12/28/20 expressing the Commission's support of the project was provided and is available by clicking the link on the top of the memo.

## VI. Planning Analysis

Before getting into the analysis of the Preliminary Plan application, staff would like to emphasize that, by law, this application is vested to the rules and regulations in place at the time it was vested during the Master Plan application process and is **NOT** subject to the revisions to the City Code or Comprehensive Plan that have occurred since.

The Master Plan Decision is currently under appeal in Superior Court. The developer is moving forward at risk of the outcome of this appeal.

Additionally, staff respectfully reminds the Plan Commission that the review of the Preliminary Plan is not to be duplicitous to that of the Master Plan. Members of the Commission (and public) may believe that this use is not appropriate at this particular location, but that determination was finalized with the Master Plan approval (albeit with a 5-4 vote). For this reason, staff will not revisit or attempt to revise the findings that resulted

from the Master Plan review process, but will focus on the items specific to the review of the Preliminary Plan proposal, and address any concerns about the potential impacts of the project.

## **Landscaping & Screening**

The landscaping of the project is arguably one of, if not *the* most important mitigation element for this project, particularly due to its location within a residential area. Recognizing this, the Plan Commission incorporated several conditions into the Master Plan Approval to require/ensure effective buffering of the project, including the hiring of a professional Landscape Architect to review all proposed landscape plans, the creation of an Advisory Committee for the purpose of providing input to the Landscape Architect as part of an inclusive approach with the neighborhood, and required the review of the landscape plans by the Conservation Commission. The City hired Sara Bradford, RLA, ASLA, of Bradford Associates to conduct the peer review at the applicant's expense. The individuals on the Advisory Committee were Plan Commission Vice Chair Fred Vincent, Applicant Representative Lindsay McGovern, Planning Staff Representative Joshua Berry, AICP, and two elected members to represent the neighborhood, Drake Patten and Daniel Zevon.

The Advisory Committee convened remotely on three occasions, 8/25/20, 9/22/20, and 10/22/20, the minutes and transcripts for which are available at the link provided at the top of this memo. It would be difficult to summarize the proceedings and input of the Advisory Committee, especially because the body was not required to come to a consensus but were individual voices. There was general agreement that significant progress was made, but there were differing opinions on items including but not limited to whether there was sufficient buffering of the viewsheds from the east, south, and northwest. Despite some outstanding comments from the abutters, **staff finds that the applicant has complied with Master Plan Approval Conditions #1 & #3.**

The input from the Committee members and the resulting report from the City-hired Landscape Architect Sara Bradford, RLA, ASLA, are available online. This memo will not get into detail regarding Ms. Bradford's report, but does highlight the following statement in the report's conclusion, "*Views will not be completely blocked. Abutters will be aware of the solar development but the plan with proposed amendments does provide reasonable visual relief through buffers and strategic planting effective for the initial development and particularly as a longer term visual screening investment.*"

After receiving the Landscape Architect Peer Review Report dated 11/9/20, the applicant has since had the application reviewed by the Development Plan Review Committee (DPRC) and the Conservation Commission. The landscape plan exceeds the minimum requirements codified in City Code Section 17.84.140 *Development and Landscaping Design Standards*, so Committee largely deferred to the Plan Commission's discretion in review of the landscape plans.

The Conservation Commission reviewed the plans remotely at its 11/24/20 meeting and issued a letter dated 12/28/20 that expresses support of the landscape plans. Staff has discussed this matter with Mr. Carl Santucci, Chair of the Conservation Commission, and has confirmed that Mr. Santucci will attend the Plan Commission meeting on 1/5/21.

It is important to note that the version of the Landscape Plans that the above mentioned groups have reviewed are not the same as what has been submitted for the MLD Preliminary Plan. The plan that the Advisory Committee, DPRC and Conservation Commission reviewed had a last revised date of 10/23/20. The revisions dated 10/23/20 have since been removed from the landscape plans and replaced by revisions dated 11/30/20. Staff has discussed these changes with the applicant's Landscape Architect, John C. Carter, RLA. Additionally, page 3 of the applicant's project narrative explains the divergences from the peer review recommendations and there are pictures provided as part of the justification for the divergences in regards to additional plantings recommended for Planting Area D.

Ms. Bradford has provided a letter dated 12/31/20 which responds to the 11/30/20 landscape plan which is available by clicking the link at the top of the memo. The letter states, "*The current plans have responded to critical concerns with some notable revisions but there are still important issues to be resolved.*" Due to this letter being received on 12/31/20, the date that this memo is being published, staff does not have ample time to incorporate its contents into the analysis. Rather, the outstanding issues in combination with the limited time to review and resolve such issues gives staff pause in recommending approval of the preliminary plan at this time. It is possible that these issues (which do not appear to be insurmountable) could be resolved by the Plan Commission, Ms. Bradford and the applicant during the upcoming hearing, but staff will hold back on making a full recommendation until that time. Staff made a hastened attempt to translate Ms. Bradford's recommendations into DRAFT conditions for purposes of review discussion.

Although staff defers to the Commission's hired expert as stated above, staff would like to offer a few observations:

- The last version reviewed by the Advisory Committee included revisions to Planting Area D which were a direct response to input from Ms. Bradford and the Committee. A planting detail for Area D was provided on sheet 6 of the 11-23-20 plans which shows a 15' depth of the southern-facing portion of the buffer. This detail has been removed and the width has been revised back to 10'. Staff is unclear as to the justification of this change, particularly as the change does not appear to be addressed in the narrative, and would ask the applicant to speak to this issue.
- Staff is happy that the applicant has addressed the viewshed from the northwest. There was discussion amongst the Advisory Committee as to whether existing vegetation outside of the lease area could be fully relied upon as part of the buffer plan for the solar project. This area is outside of the applicant's ability to control, and the property owner has not offered and to restrict his ability to maintain the existing vegetation in this portion of his property, although the narrative states that "*He has no intention of doing that so there is no reason to plant 7-8' trees now, the trees as proposed will mature and create an evergreen screen over time.*" Staff has no reason to doubt this is true, but cannot base mitigation on trust alone. If this area is part of the buffer plan for the solar project, **staff recommends that assurances be made to preserve it until the time when the proposed plantings would grow to provide a sufficient screen, or alternatively, that the plantings are provided at the heights recommended by Ms. Bradford.**

Leaning on Ms. Bradford's expertise, it is up to the Plan Commission's discretion as to whether an effective buffer plan is being proposed. If it is determined that revisions or changes are required to the plans, staff recommends that specific language be drafted to be included in conditions should the Plan Commission decide to approve to Preliminary Plan.

### **Grading, Stormwater & Drainage**

The applicant submitted a Request for Preliminary Determination to the Department of Environmental Management's Freshwater Wetlands Program and was issued an Insignificant Alteration Permit on 12/6/20. The review for this permit combines the requirements for grading/stormwater discharge/drainage and freshwater wetlands. Please see the Insignificant Alteration Permit letter uploaded to the website to observe the conditions of approval. The City typically avoids adding conditions that would be duplicative to RIDEM's, however staff believes that the condition for the fence gap is something that the City may want to be able to enforce, and therefore **staff recommends incorporating the language of RIDEM's condition #17 into the City's conditions should the project receive approval, slightly modifying the language to be clear that the gap applies to the entire perimeter of the fence.**

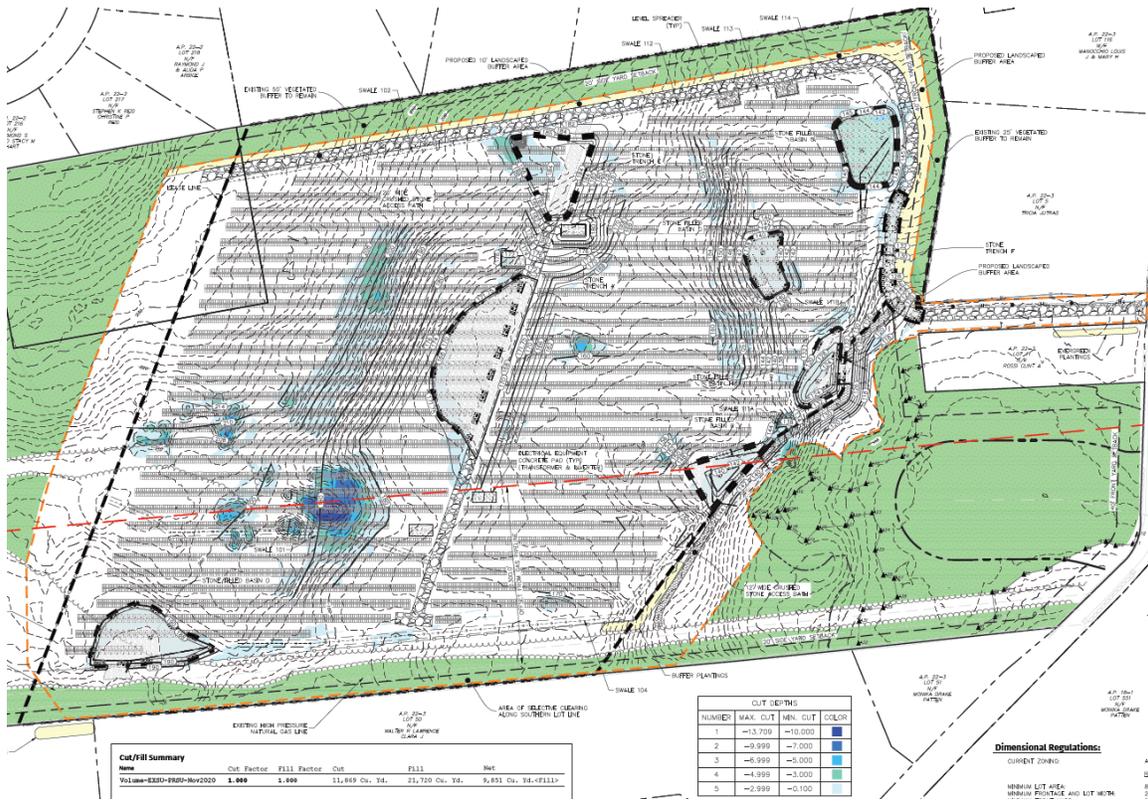
In addition to receiving approval from RIDEM, the application received Preliminary Plan Approval from the Development Plan Review Committee (DPRC). The applicant's full Preliminary Plan submittal including the Full Plan Set, Stormwater Management Report, Stormwater System Operation & Maintenance Plan, and Soil Erosion & Sediment Control Plan all have been reviewed and approved by the DPRC.

There was a condition of the Master Plan Approval that spoke specifically to the grading of the site, Condition #7 "*The development shall follow existing grades as much as possible, where changes are required, they shall be kept as minimal as possible.*" Planning staff has worked with DPW and the applicant to ensure compliance with this condition. The applicant has supplied a Cut-Fill Exhibit which identified areas and depths of cuts throughout the project area (blue shaded areas) as well as calculates the total cubic area of cut and fill (11,869 Yd<sup>3</sup> of cut and 21,720 Yd<sup>3</sup> of fill for a net of 9,851 Yd<sup>3</sup> of fill).

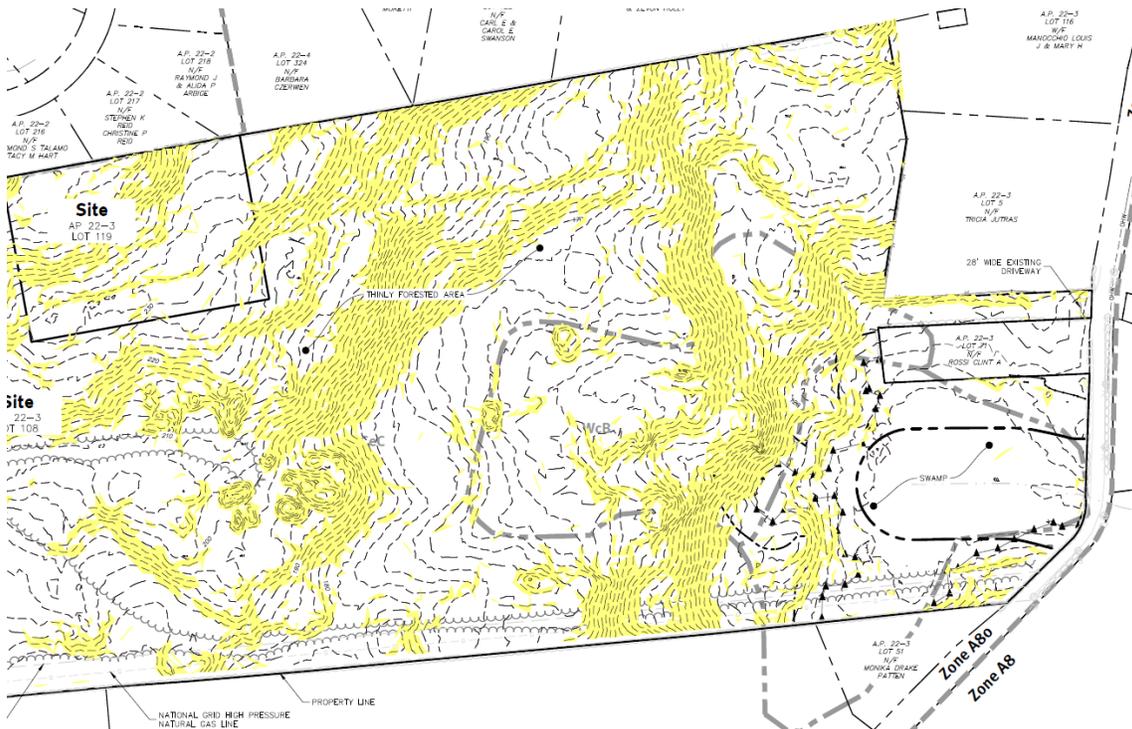
On the following page exhibits are provided to compare the Existing Conditions Plan (sheet 4 of the Full Plan Set) to the Cut-Fill Exhibit. One can observe that that the proposed areas of cut and fill have been minimized to the areas with the steepest slopes on the site and for installation of drainage facilities. Therefore, **staff finds that the applicant is in compliance with Master Plan Condition #7 in terms of following existing grades as much as possible.**

There is a portion of Master Plan Condition #7 that refers specifically to removal of ledge or rock, stipulating that the removal shall be mechanical as much as possible. As the exact methods of removal have not been determined, **staff recommends incorporating this language into the Preliminary Plan conditions, as well as Master Plan Approval Condition #10 regarding the consideration of testing of abutters wells prior to blasting**, should the project receive approval. As stated in the narrative, the applicant has met with representatives of the Tennessee Gas Pipeline on site and will be carefully coordinating with them.

# CUT-FILL EXHIBIT



# EXISTING CONDITIONS PLAN WITH SLOPES OVER 15%



## Interconnection

The applicant has provided an Interconnection Plan which is available on the link at the top of this memo. This plan shows the proposed new and replaced poles as well as the methods to secure the poles. The existing 35' poles will be upgraded to three-phase power, which increases pole height to 45'. Tree trimming is anticipated. The applicant has explained that this plan was created by taking information provided by National Grid and overlaying it onto the surveys by DiPrete Engineering, Inc. The offsite utility plan involves nine (9) new guy poles all within the City right of way, five (5) of which are new stub poles (supporting poles). There are four (4) new poles proposed onsite. The pole numbers are listed below with their corresponding sheet numbers where they can be found.

### New (not merely replaced) Offsite Poles

1. NGRID P37-84 p. 5
2. NGRID P38-84 p. 5
3. NGRID P47-84 p. 6
4. NGRID P48-84 p. 6
5. NGRID P50-84 (stub) p. 6
6. NGRID P51-84 (stub) p. 6
7. NGRID P60-84 (stub) p. 7
8. NGRID P67-84 (stub) p. 8
9. NGRID P70-84 (stub) p. 8

### New Onsite Poles (all on sheet/page 9)

1. NGRID P74-1
2. NGRID P74-3
3. NGRID P74-5
4. NGRID P74-7

The Department of Public Works has reviewed the Interconnection Plans. The new poles are required to go before the City's Public Works Commission for approval. DPW has requested that National Grid consider moving the location of poles along Natick Avenue a few feet further away from the road towards the edge of the right of way, where feasible. No response to this request has been provided at this time.

There have been unsightly outcomes related to interconnections of other solar projects in the City. In an effort to avoid repeating such outcomes, similar to the City's ability to require all new subdivisions to bury electrical utility poles, **staff recommends that the plan be revised so that onsite utilities be buried underground connecting to pad-mounted transformers.**

## Decommissioning

A decommissioning bond will be required for this project, which is to be finalized during the building permit phase. The bond will cover costs associated with the removal of installations, electrical equipment & all appurtenant structures, and stabilization or revegetation of the site as necessary to minimize erosion.

## **VII. Findings**

**The following conditions are DRAFT versions for consideration as staff cannot make findings #2 and #5 until the outstanding issues with the Landscape Plans are resolved.**

1. An orderly, thorough and expeditious technical review of this Preliminary Plan has been conducted. Property owners within a 100' radius have been notified via first class mail and the meeting agenda has been properly posted and advertised.
2. The applicant has complied with the conditions of the Master Plan Approval, or where conditions could not have yet been met at this time, conditions are carried over into the Preliminary Plan conditions.

*RIGL § 45-23-60. Procedure – Required findings. (a)(1) states, “The proposed development is consistent with the comprehensive community plan and/or has satisfactorily addressed the issues where there may be inconsistencies.”*

3. The application is vested to the Comprehensive Plan in effect at the time the Master Plan application was certified complete. Revisions to the Comprehensive Plan since that time do not apply to the review of this Preliminary Plan Application.
4. Consistency with the Comprehensive Plan was discussed extensively during the Master Plan review process. Ultimately, albeit with a 5-4 vote, the Plan Commission approved Master Plan approval incorporating findings of consistency with the Comprehensive Plan into its decision as stated in the Master Plan Approval Letter dated 2/11/19.
5. The applicant has worked with the City-hired Landscape Architect, the Advisory Committee, Planning staff and the Conservation Commission to develop an effective screen to mitigate impacts to the visual character of Western Cranston.

*RIGL § 45-23-60. Procedure – Required findings. (a)(2) states, “The proposed development is in compliance with the standards and provisions of the municipality's zoning ordinance.”*

6. The application is vested to the City Code in effect at the time the Master Plan application was certified complete. Revisions to the City Code since that time do not apply to the review of this Preliminary Plan Application.
7. The proposed solar and existing agricultural uses were permitted uses by-right in the A-80 zone at the time the Master Plan was certified complete.
8. The site is comprised of two lots, merged for zoning purposes, which meet the requirements of A-80 zoning.
9. The project is consistent with items (A) Site Preparation and (B) Lighting found in City Code Section 17.24.020 Solar Power Performance Standard (this section has since been revised, but the application is vested to comply with this now

outdated section). Items C-G of this section do not apply to the Preliminary Plan phase of the application.

*RIGL § 45-23-60. Procedure – Required findings. (a)(3) states, “There will be no significant negative environmental impacts from the proposed development as shown on the **final** plan, with all required conditions for approval.” (emphasis added)*

10. This project has received an Insignificant Alteration Permit from RIDEM and will continue to be subject to all local, state and federal standards regarding environmental impacts.
11. Grading of the project has been limited to the greatest extent possible.
12. The Rhode Island November 2018 Natural Heritage map shows that there are no known rare species located on the site. There nearest known rare species locations are roughly 1,600 meters away. This information has been confirmed by David W. Gregg, Ph.D. Executive Director of the Rhode Island Natural History Survey.
13. Solar energy production has an important role in the reduction of greenhouse gas emissions contributing to climate change. There are a multitude of environmental benefits (as well as numerous other benefits) to clean renewable electricity as found by the Environmental Protection Agency in their 2018 report, “*Quantifying the Multiple Benefits of Energy Efficiency and Renewable Energy: a Guide for State and Local Governments.*”

*RIGL § 45-23-60. Procedure – Required findings. (a)(4) states, “The subdivision, as proposed, will not result in the creation of individual lots with any physical constraints to development that building on those lots according to pertinent regulations and building standards would be impracticable. (See definition of Buildable lot). Lots with physical constraints to development may be created only if identified as permanent open space or permanently reserved for a public purpose on the approved, recorded plans.”*

14. The project proposes lease areas, not the actual subdivision of lots. No change to the existing lot boundaries are proposed.

*RIGL § 45-23-60. Procedure – Required findings. (a)(5) states, “All proposed land developments and all subdivision lots have adequate and permanent physical access to a public street. Lot frontage on a public street without physical access shall not be considered in compliance with this requirement.”*

15. The property in question has adequate permanent physical access from Natick Ave, improved public roadways located within the City of Cranston.
16. The proposed use will not have a negative impact on vehicular traffic, generating only a monthly inspection once operational.

## VII. Recommendation

Having received correspondence from the Plan Commission's Landscape Architect Peer Reviewer confirming that outstanding issues remain, staff recommends that the Plan Commission continue the matter to the February 2<sup>nd</sup> Plan Commission Meeting.

However, for discussion and review purposes, or in the event that the issues are resolved and/or the Plan Commission decides to vote on the application during the 1/5/21 public hearing, staff offers the following DRAFT recommendation and conditions.

### DRAFT Recommendation:

Staff finds this proposal consistent with the standards for required Findings of Fact set forth in RIGL Section 45-23-60, the Comprehensive Plan in effect at the time of vesting of the application, as well as with the City of Cranston's Subdivision and Land Development Regulations. Therefore, staff recommend that the City Plan Commission adopt the Findings of Fact documented above and approve the Preliminary Plan submittal, subject to the conditions denoted below:

## VIII. DRAFT Conditions of Approval

1. The applicant will work with the Tennessee Gas Pipeline to (TGP) to ensure that the project will be consistent with the terms and conditions of the easement.
2. In the event of ledge or rock, removal of such be mechanical to the greatest extent possible.
3. Onsite utilities shall be buried underground connecting to pad-mounted transformers unless evidence can be provided to the Department of Public Works and Planning Department as to why this is not a feasible option.
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.
5. Planting Group D on the Landscape Plans shall be enhanced with at least one additional 10' x 50' planting group.
6. The minimum height of trimming of Planting Area D as shown on the Landscape Plans shall be 12'.
7. A formal written agreement shall be submitted as part of the Final Plan application to preserve the existing vegetation serving as a buffer to the project site from the west/northwest of the solar project.
8. Planting Area E as shown on the Landscape Plans shall be relocated to the edge of the lease area so that the pines may grow naturally and untrimmed. Similar plantings shall be provided in the southeast at the edge of clearing near Planting Area D.

9. The applicant shall provide a \$\_\_\_\_(TBD)\_\_\_\_\_ cash escrow to be used solely for the City's chosen landscape architect to conduct biannual inspections of the site for the next three years to monitor consistency of the installation with the approved plans, and to determine the efficacy and health and the required plantings.
10. Underneath the solar arrays, the applicant shall install an appropriate growing medium, either minimally disturbed topsoil or a minimum of 6" of suitable loam and seeding to provide for a strong stand of native or naturalized vegetation for both grasses and leaf species.