



BEAVER RIVER VALLEY COMMUNITY ASSOCIATION

P.O. Box 10
Shannock, RI 02875

June 16, 2019

Richmond Town Council
5 Richmond Townhouse Road
Wyoming, RI 02898

Dear Richmond Town Councilors,

The Beaver River Valley Community Association (BRVCA) is a nonprofit organization dedicated to the conservation and preservation of the Beaver River Valley in Richmond, Rhode Island. Our growing membership is comprised of property owners and residents of Richmond. We seek to protect our farmlands, forests, open space, wetlands, rivers, waterways and historic areas and to preserve and restore our ecological systems. This Tuesday, June 18, 2019 you will be asked to vote on two zoning amendments proposed by Providence-based solar developer, Northeast Solar/Buonomano. As a community association seeking to conserve Richmond's rural, scenic and agricultural character, we are deeply concerned by this proposal. **We encourage you to deny the requested zoning amendments.**

The Beaver River Valley - and by extension Richmond- is home to centuries of important historical, cultural, and natural resources, including three of only six sites in Richmond listed on the National Register of Historic Places: the Hillsdale Historic and Archeological District (National Register of Historic Places #80000021), the Samuel Clarke Farm (National Register of Historic Places #SG100003413), the Village of Shannock Historic District (National Register of Historic Places #83000005). The Beaver River Valley is also part of the federally-designated Wood-Pawcatuck Watershed Wild and Scenic River. Richmond possesses historically significant Native American sites, farms, mill villages, and wildlife habitat. Allowing more solar development threatens these regionally significant resources. Furthermore, some of Rhode Island's most valuable prime agricultural soils are found in Richmond. Allowing solar canopies and expanded accessory coverage will diminish the production and quality of these soils for years to come.

At the May 21, 2019 Town Council meeting, the applicant Mr. Buonomano suggested that he somehow suffered an unfair and biased hearing by the Richmond Planning Board. On the contrary, the members of the Planning Board recommended that this application be denied because it is not consistent with the Comprehensive Community Plan and also because it does not support agriculture, encourages solar sprawl, and will not preserve open space and natural resources. Specifically, the proposal conflicts with the following sections of the Comprehensive Community Plan:

- GOAL LU 1: Support development without adversely affecting public health or degrading the quality of man-made and natural environments.
- Goal LU 2: Support development that maintains the rural character of Richmond.
- Policy LU 8: Encourage development that protects the town's historical and archaeological heritage
- Policy LU 11: Preserve significant open space, agricultural, and natural resources.
- Action LU 20: Support the preservation of new open spaces within proximity to existing open space and state-owned land so as to avoid fragmentation of open space.
- Richmond possesses productive agricultural soils that “should be preserved as open space rather than developed” (pp. 105).

This consistency determination is the Planning Board’s primary duty. The Planning Board unanimously found that Northeast Solar’s application conflicts with the Comprehensive Plan.

In the context of Richmond’s planning efforts relative to solar development, it is notable that the existing solar ordinance regarding farm accessory use was adopted in 2016. We have yet to see the full impact of the existing regulations, which provide farmers with a means to supplement their income with solar installations by allowing 50,000 square foot installations as accessory uses. This provision is more than adequate. We respectfully encourage you to wait for those effects to be borne out before allowing solar canopies and expanded accessory coverage. To enable new installations of 100,000 square feet or existing installations to expand to 100,000 square feet by right is not consistent with the Comprehensive Community Plan. There has been no request for expanded coverage made by the farmers with existing accessory solar installations; none of those farmers have found that the revenue allowed under the existing ordinance is insufficient to support their farm operations.

As Planning Board member Hess stated during the April 23, 2019 Planning Board hearing regarding this application, solar canopies are not permitted in any of the state’s renewable energy programs and the Public Utilities Commission does not permit National Grid to connect to canopies. Allowing this form of solar installation is therefore unnecessary.

The existing solar ordinance provides language for regulating solar development; however, it is Richmond’s Planning Board, Zoning Board, and Town Council members who are charged with administering those regulations for the public benefit and welfare of the entire community. The proposal before you attempts to manipulate community-wide regulations for the benefit of a single, Providence-based developer. Northeast Solar will be the primary beneficiary of the proposed zoning amendments. Make no mistake, the proposed amendments are driven by the motivating factor behind all development: financial gain. Despite claims that struggling farmers are advocating for these zoning changes (none of whom are appearing to testify that they need additional income to support farm operations) and that Northeast Solar is helping farmers, there is nothing altruistic motivating this request. Northeast Solar is preying on our town’s largest landowners in an effort to exploit their most valuable asset: their agricultural land.

As with the farmers, this developer will likely claim that he is trying to help the Town Council stimulate economic development. This could not be further from the truth: allowing expanded solar development and solar canopies will not translate to increased tax revenue or land valuations. It will in fact have the opposite effect, sacrificing all of Richmond's scenic agricultural fields for solar development and the unsightly infrastructure that accompanies it - chain link fencing, overhead power lines, transformers and insufficient, short-lived vegetative screening. This is not the future landscape character envisioned in the Comprehensive Community Plan.

Richmond's identity and its ability to attract residential and commercial property owners is directly linked to its scenic, rural character. We urge you to retain that identity and, instead of allowing a losing proposition, invest in economic development that will actually benefit the town and its taxpayers for the long term.

Thoughtful, low impact economic development opportunities exist: promoting and encouraging agrotourism and recreation provides a sustainable, sensitive approach to economic development that complements Richmond's existing regulatory framework and community character. This approach also enhances land values and quality of life rather than diminishing property values and taxpayer welfare like solar development does. Instead of jeopardizing property values for the majority of the community, we encourage you to take Richmond residents' concerns into account and deny the requested zoning amendments.

Thank you for your time and consideration.

Respectfully,

A handwritten signature in cursive script, appearing to read "John Peixinho".

John Peixinho
Treasurer, Board of Directors