



BEAVER RIVER VALLEY COMMUNITY ASSOCIATION

P.O. Box 10
Shannock, RI 02875

June 6, 2019

Town of Richmond Planning Board
5 Richmond Townhouse Road
Wyoming, RI 02898

Dear Members of the Town of Richmond Planning Board,

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 rapidly 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 11, an application by GD Beaver River I, LLC seeking to construct a 5.3 mega-watt ground-mounted solar energy system at 172 Beaver River Road will be before you. 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 recommend that the Zoning Board deny the requested special use permit.**

If installed, this solar development will irreversibly change the character of one of Richmond's most historic areas: the Beaver River Valley. This landscape 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. According to the Wood-Pawcatuck Wild and Scenic Rivers Stewardship Council, the Beaver River is 91% undeveloped and heavily forested; nearly half the river runs through protected properties including the RIDEM Hillsdale Conservation Area, The Nature Conservancy's Beaver River and Grassy Pond Preserves, and local land trusts. It is home to historically significant Native American sites, farms, mill villages, and wildlife habitat. **The proposed solar installation site threatens all of these regionally significant resources as its proposed siting is immediately adjacent to the Beaver River.**

The North Kingstown-based developer and applicant, Green Development, is responsible for building the largest onshore wind farm in Rhode Island. Green Development will likely claim that their Beaver River Road proposal will bring economic development to Richmond. **Please do not be swayed by such false claims.** The entire community benefits from the retention of this parcel as is. Only two parties benefit from its conversion to solar development: the landowner and developer. Any purported economic benefit will be outweighed by the blighting of one of the most valuable landscapes in Richmond. Instead we encourage you to consider the economic value directly tied to Richmond's - and particularly the Beaver River Valley's - existing resources. In addition to prime soils, land, open space, and forest, this area contains some of the highest tax-generating residential properties in Richmond. And with good reason: its scenic character is attractive and it is directly tied to the desirability and assessed value of parcels in this area. Residential property values in this part of Richmond will be negatively impacted if this solar development is installed. This proposal also threatens the quality of place that residents and visitors enjoy. That quality derives from the open fields, quiet country roads, trails, and forests that characterize the Beaver River Valley. Once these critical assets are lost, they will be gone forever.

The BRVCA recognizes the need for renewable and alternative energy sources. These sources, however, are *manufacturing* energy and therefore should be sited on parcels more appropriately suited to manufacturing uses, such as industrial and commercial zones and on gray- and brown-field parcels that have already been disturbed. Richmond's prime agricultural land, forests, open space and scenic quality should not be sacrificed for manufacturing energy. 172 Beaver River Road is situated in an R-3 Zone in which solar installations are not allowed as of right, but by special use permit only. The special use permit process exists to provide additional oversight to determine whether a proposal complies with the Zoning Ordinance and the Comprehensive Community Plan. The application of Green Development does not comply with the Town of Richmond Zoning Ordinance 18.34.030(A) as the proposed installation does not fall within the required two mile utility substation radius.

Determining consistency with the Comprehensive Community Plan is the Planning Board's primary responsibility. The GD Beaver River proposal conflicts with Richmond's Comprehensive Community Plan goals of preserving the town's rural character, natural resources and open space. Specifically, it is not consistent with the following goals, policies and actions of Richmond's Comprehensive 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).

We urge you to please consider these critical elements of our town's guiding planning document as you formulate your recommendation to the Zoning Board. Thank you in advance for your consideration and time.

Respectfully,

A handwritten signature in black ink, appearing to read "John Peixinho". The signature is fluid and cursive, written in a professional style.

John Peixinho

Treasurer, Board of Directors