

HOPKINTON CONSERVATION COMMISSION

One Town House Road

Hopkinton, RI 02833

April 7, 2021

Mr. Al DiOrio, Chairman, Hopkinton Planning Board

One Town House Road, Hopkinton, RI 02833

Re: Stone Ridge Plat 11 Lot 47A Project Summary

Dear Mr. DiOrio:

Chairman Buford and Kerry Robinson of the Narragansett Chapter Appalachian Mountain Club made three snow covered site walks totaling 10 hours with project representatives (Mike Marano 3 walks, Sergio Cherenzia 3, Bill Landry 1, Ashley Iannuccilli 1) during February. In a rough way, they visited the bulk of the 252 acres. The Stone Ridge project was discussed at multiple Conservation Commission meetings. Sergio and Mike actively participated in the 2-11-21 regular and 4-1-21 special meetings. Conservation Commission members have attended the Planning Board meetings for this project including the Pre-Application over a year ago and the 3-3-21 Master Plan hearing. All of these interactions provided background for our current project summary we are providing for the 4-7-21 Master Plan hearing that follows. The summary is organized into broad topics.

OPEN SPACE

The initial concept plan was for a fully developed project with solar and warehouses and no high and dry open space left unused. We made it clear that if that was going to be the project then there was little point in conducting site walks. We questioned whether the 40% open space requirement of the old Brae Berne project rezone may still apply. Our understanding is this is calculated as undisturbed areas plus stormwater areas. As it turns out the most recent proposal includes a summary of open space classifications outside the fenced areas in the new Open Space Figure that has 37% Undisturbed High and Dry and 46% when you add in the Stormwater areas outside the fence and the cleared but Landscaped areas. This seems similar to how open space is calculated for a cluster subdivision for instance. This has allowed intact preservation of the most well-defined section of Narragansett Trail on the property and a substantial number of cultural features of the Native American cultural stone landscape, foundations and stone walls. We would like more details at Preliminary for restoration of the old gravel bank and pond area.

GROUNDWATER

The major concern is that more precipitation will run off from the cleared areas than from the original forest, leaving less for recharging the groundwater. The annual precipitation volume for the property is ballpark 300,000,000 gallons. We do not know what the before and after surface runoff volume calculations will be, only that the detention ponds are designed to keep the runoff volume per unit of time within pre-construction parameters. Groundwater is released to Canonchet Brook much steadier

than what the same volume of water diverted to and emptied from the detention ponds will do. This will affect the water level and temperature of Canonchet Brook during dryer or wetter times. We discussed ways to improve infiltration and more closely match conditions of a forest. We requested they scarify or otherwise remedy soil compaction late in the construction process such as between and under the panels and within the detention basins to increase infiltration. The construction, surface preparation and vegetation establishment will be phased due to the project size. Sergio said RIDEM recognizes the need and will have new guidelines for improved solar project infiltration that will be adopted on this project. The applicant is committed to better infiltration. Ashley will provide photos of the pollinator mix used for bioretention areas on prior projects that will turn those areas on this project into attractive viewsheds for nearby hikers on Narragansett Trail during her presentation.

SOLAR PERFORMANCE ENHANCEMENT

They expect to engage Constellation Energy as the solar constructor. We asked and they agreed to do a presentation to the Planning Board where they will quantify their choices to use better performing panels, tracking system options, and layout to produce the most electricity for the project footprint. The Conservation Commission feels there are too many environmental benefits available to let this go unaddressed as has been the case for prior utility scale solar projects. We hope to see graphically how various combinations of products and installation will affect system performance and how this affects project cost/benefits. Ideally, this may lead to shrinking the Limits of Disturbance without a reduction of the clean energy being produced.

TRAILS

The maintained section of Narragansett Trail (NT) in Hopkinton runs from the Canonchet Preserves Main Street Trailhead to the Connecticut border near Green Falls Pond. Farmer George Reynolds owns the land on both sides of I-95 that once connected NT from Stone Ridge to Canonchet Preserves. His land on the south side of Canonchet Brook (Plat 11 Lot 36) next to Stone Ridge is unused, being so isolated by I-95. George wishes to work with the Town to use this land to extend NT between Stone Ridge and Canonchet Preserves including a solution to crossing I-95. It seems feasible to add a new trail connection for hikers, especially nearby neighbors on Palmer Circle, that uses the new access road and, in the vicinity of the cemetery, crosses onto Reynolds to avoid wetlands on Stone Ridge. This would intersect NT on Reynolds not far from where NT now crosses onto Stone Ridge. It might then be possible to hike around the perimeter trail until close to the storage building and connect with the access road for a full loop. We will inspect this possibility on a future site visit. This is definitely on our wish list for the Narragansett Trail Restoration Project and relies heavily on the good will of the applicant. Tomaquag and Coon Road Trails coming up from the south via Land Trust property on Woodville Road can reconnect to NT if the one intervening property owner agrees. Our experience is that when it comes to long distance trails, you have to dream them up before they become possible. It has, for instance, been a goal of the Conservation Commission since the late 1990s when we participated in the South County Greenspace Project to develop Tomaquag Trail from Westerly to Narragansett Trail and on to the Exeter border. Six large properties have now been preserved along this corridor.

The landscape plan for the long NT loop around the solar arrays will be enhanced with a relocated stone wall just outside the fence, meandering of the trail through adjacent wooded areas and additional plantings. It will be the opposite of the ugly fence and crushed stone surfaced trail provided along the perimeter of the Southern Sky project.

FENCING

HCC is requesting the project specify 7 ft or higher high tensile farm type fence with black vinyl coating for improved performance but especially because it is less visually intrusive than ugly chain link fence. It meets both solar ordinance and National Electrical Code specifications. We have provided photos and product links to Stone Ridge. They have agreed to consider this fencing. We request the Planning Board also express their preference for this much more aesthetic choice. Whatever fence is chosen will be black and non-reflective. We have also suggested a drive gate and associated fencing be installed off Palmer Circle to be normally locked to block vehicle and off-road vehicle trespass. A simple pedestrian bypass should be provided if an agreement is reached for trail access from Palmer Circle.

CEREMONIAL STONE LANDSCAPE

During the February site visits we observed several hundred stone features in several areas of the site. One major area of about 19 acres where the solar arrays were deleted from the plans hosts a good many of the stone features. Some other stone features are in areas not being developed. The applicant has stated that none of these will be disturbed. Others fall within the solar footprint and will either be destroyed or be spanned over when the panels are installed. They have given permission for the New England Antiquities Research Association to document the cultural stone landscape for location, characteristics, alignments, and age prior to construction. This will be for features that will be preserved and those that will be removed or spanned over. We will flag the features and Sergio will locate them on the plans. The Conservation Commission feels this should be a good will effort by everyone and we have to recognize it is unlikely that all the ceremonial stone features can be preserved.

STONE WALLS

There are, ballpark, 2.5 miles of internal stone walls and, ballpark, 1.5 miles of them are within the Limits of Disturbance. Most appear to be farm walls although some of these have Native American features incorporated in them. The Wordens who probably built these walls are thought to be Native American. The walls roughly align E-W and N-S. The applicant, unlike any previous solar projects, is presenting a plan to conserve the stone walls to achieve aesthetic, cultural and environmental benefits. As explained to us, some of the walls may remain untouched within the Limits of Disturbance (LOD) depending on layout of the solar arrays not yet designed. The plans show other walls relocated within the solar arrays that will provide an environment conducive to wildlife. Finally, the plans show walls relocated to the perimeter fence areas where they will be a landscaping feature of Narragansett Trail. The Conservation Commission has requested the applicant consider use of a stone wall where the access road will pass close to the unwallled Worden Cemetery. This could be on the uphill side of the cemetery or enclose the entire small cemetery. The applicant intends to consult the Historic District Commission and the Hopkinton Historical Association regarding preservation work at the cemetery.

EASEMENTS

We brought up our expectation that easements would be needed for the trails and at least some of the open space such as the area where solar panels were deleted so the cultural landscape can be preserved. The applicant responded they will not entertain easements but will look to some unspecified alternative to assure these preservation uses will persist. We then forwarded them Land Trust example

easements for a trail and for a conservation easement on another property in town. These clearly spell out the descriptions and conditions as well as assume primary responsibility by the Land Trust to deal with any liability issues. How the promises for use of the trails and preservation of the open space and cultural landscape will be kept in perpetuity remains open at this time. We feel it should be resolved by Preliminary.

WILDLIFE

As noted in the Wildlife Report, the project area is within a 1000+ acre contiguous forest. There is general recognition that numerous animal species need larger forests to thrive so losing 10% here is a disadvantage. However, fossil fuels and their entire supply chain are deadly to wildlife and replacing them with solar is a plus. Shrinking the project footprint by maximizing solar energy production density is a plus that should be encouraged by the Planning Board. Retainage and reuse of the stone walls to enhance wildlife is a plus. Pollinator wildflower species in the detention areas is a plus. The wooded wetlands will not be disturbed, at least not directly. Every effort that can be made to infiltrate more precipitation into the groundwater and reduce runoff from the detention ponds will benefit the wildlife in Canonchet Brook and Tomaquag Brook.

WAREHOUSE

The first concept plan featured a row of large warehouses with plans for daily employees and multiple parking spaces. It would be located in the minority portion of the property within the Town's Primary Groundwater and Wellhead Protection Zone. This is now reduced to one much smaller 15,000 sf storage building.

COOPERATIVE APPROACH TO A BETTER PROJECT

Several years ago, the Conservation Commission identified the large undeveloped properties in town appropriate for preservation at no cost to taxpayers by installing wind turbines. It turns out this property could have been preserved with one wind turbine and a LOD of just a few acres. Instead, a vocal segment in town who opposes any and every renewable energy project managed to get the Town Council in a 3 to 2 vote to prohibit wind turbines entirely. Time passed and the future of this property remained undecided. An entrepreneur acquired the property, checked with the Town as to whether it is zoned for solar, and is now before the Planning Board for that purpose. There is no doubt the 111 acres within the Limits of Disturbance for the solar project are more disruptive than one wind turbine but that is a decision made by the Town before this developer arrived. We are now at a point where the Conservation Commission, at least, is trying to get the best possible solar project. Ballpark, this project will power over 3000 houses with clean energy. That is an important plus.

What is different is that for the first time with a utility scale solar project in Hopkinton, we have an applicant who seems to genuinely care that this be a great project and not just be a gimme, gimme, gimme like most of our other solar projects. We know the proof is in the pudding. The Conservation Commission encourages the Planning Board to think deeply about the kinds of topics we have brought up above and to work with the goal of making this the best utility scale solar project in Rhode Island.

Sincerely,

Harvey Buford, Chairman