



Save The Bay Center
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January 18, 2024

RIDEM Freshwater Wetlands Program
Attn: Martin Wencek
235 Promenade Street
Providence, RI 02908

Re: 22-0100 Hidden Valley Solar, LLC Application to Alter Wetlands

Dear Mr. Wencek,

Save The Bay objects to the proposed application to alter freshwater wetlands for the construction of a solar array, approximately 80 acres in size, with an access road, fencing, stormwater mitigation systems, and utilities. The work will permanently alter approximately 0.2 acres of freshwater wetlands, including swamp, pond, river, perimeter wetland and riverbank wetland. These wetland resources are associated with the headwaters of the Queen River, one of Rhode Island's most pristine wetland systems, and part of the Nationally designated Wood-Pawcatuck Wild and Scenic Rivers System.

The Queen's River in this location is a cold water fishery, water quality standard A, and is a special resource water, noted for its ecological habitat, critical habitat for rare and endangered species, and is a priority for conservation. It is an unstocked, native brook trout river, which depends on cold water inputs. The proposed access road will cross two headwater tributaries of this river. The proposed construction will reduce canopy cover over the watercourses, reducing shade and increasing water temperature. Sediment carried from an unpaved road and deposited in the river will negatively affect water quality and habitat for cold water fishery species. It is critical that the proposed box culverts not only accommodate the two rivers that the road crosses, but span the full widths of each riverbank. An 8' wide culvert at the pond and a smaller, 6' wide culvert at the outlet of dead swamp may not be adequate to convey the water *and* the wildlife that use these rivers.

This proposal includes construction of an access road that will alter 0.2 acres of freshwater wetland, by filling a historic cart path for over a mile, though conservation land. Cart paths are very likely to be in a naturalized state with mosses, and herbaceous vegetation on their surfaces. The proposed physical alterations to freshwater wetlands include at least clearing, filling, grading, and construction. These alterations will result in the permanent elimination of swamp, river, perimeter wetlands, riverbank wetlands, and forested habitat and will negatively impact wildlife species presently using the site. The site provides habitat for resident and migratory wildlife including a wide variety of birds, amphibians, reptiles, mammals, and insects. The direct loss of habitat will eliminate perching sites, nesting and brood rearing areas, sheltering cover, feeding sites, sources of food, roosting areas, and fragment a virtually undisturbed wildlife travel corridor. This will have a detrimental effect on the wildlife communities occurring in these wetland areas.

Filling, widening, and placing culvert crossings within this path will result in direct impacts to the swamp and watercourses under the road. This will result in

decreased habitat value for wetland dependent deep forest dwelling species including stream salamanders, pond breeding amphibians (wood frog, spotted salamander, spring peeper) and other wetland obligate species (four toed salamander). The proposed 20' wide road will create a gap in the tree canopy over disturbed soil and fill. The trucks that construct the road and solar array will have traveled from all over southern New England, and can very possibly transport non native and invasive plants, insects, and/or one of the many diseases affecting Rhode Island's forests, lowering habitat value for many wildlife species. Since the project will eliminate and reduce the wildlife habitat value, opportunities for members of the public to engage in active and passive enjoyment of wildlife and the natural area will be reduced.

Additionally, there appears to be access to Assessor's Plat 60 Lot 2 via Princess Pine Drive or Taggart Court, located immediately to the east of the proposed solar development. Access through these existing roadways will remove the project from wetland jurisdictional areas. Since there are opportunities to avoid and minimize physical alterations to freshwater wetlands to access upland areas, this project is random, unnecessary and undesirable.

In addition to these direct, physical impacts to wetlands, the indirect impact of the project will result in further fragmentation of the two sections of river, swamp, and a drastic increase in edge effect in the forest. The project will create a new, cleared, 80-acre opening in a core forest that is approximately 2,500 acres in size. This core forest is clearly a conservation priority for a number of land conservation groups, as referenced in the table below.

Table 1: Total acreage of land conserved within the core forest proposed for development by this project. Data taken from RIDEM Environmental Resource Map, Conservation Land in Rhode Island. All parcels are within the core forest.

The Nature Conservancy	75 acres	Bates Trail
West Greenwich Land Trust	108 acres	Eleanor Tremblay Preserve
RIDEM & The Nature Conservancy	703 acres	Queens River Macrosite
RIDEM	29 acres	Berlinski
The Nature Conservancy	98 acres	Nichols (Queens River)
The Nature Conservancy	75 acres	Talbot (Queens River)
Tipping Rock	31 acres	Tipping Rock Association
Town of East Greenwich	7 acres	Princess Pine
East Greenwich Land Trust	15 acres	Reynolds Farm
Total	1,141 acres	

Save The Bay supports renewable energy through solar installations, as long as they are properly sited. This project is not properly sited. It is proposed within a core forest approximately 2,500 acres in size, and although portions of the property were logged in 2018, that portion of the forest is regenerating, creating some of Rhode Island's most rare habitat- early succession forest. The benefits of solar energy do not outweigh the multitude of values that large intact forests provide for all Rhode Islanders, including mitigating climate change. Environmental harm will be created by clearing, grading, and removing topsoil within a section of Rhode Island's core forest.

The proposed alterations are not in the public interest. Destroying forests, which have their own climate change fighting and carbon storage functions, in order to install solar is short sighted and misguided. Permanently altering freshwater wetlands in order to access forests that are not protected by any Rhode Island regulations is a detriment not only to this swamp but to all Rhode Islanders.

Only by stringently applying the requirements to avoid or minimize will DEM begin to approach its goal of no net loss of wetlands. We ask that you uphold regulatory requirements and deny the application, finding that these alterations have not been avoided, or minimized, and thereby cannot be granted a permit under the Rules and Regulations Governing the Administration and Enforcement of the Freshwater Wetlands Act.

Thank you for your time and consideration.

Sincerely,

Kate McPherson
Professional Wetland Scientist
Narragansett Bay Riverkeeper
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