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I commend the Office of Energy Resources for their leadership in coordinating this important analysis. Sustainable Energy Advantage has done a good job of assessing the benefit-cost of Rhode Island's renewable energy programs. The draft contains very informative and useful information that can be used to improve RI's solar siting programs. The following comments are from Grow Smart Rhode Island regarding the draft benefit-cost analysis results:

I understand why core forest has been used in the analysis since it is referenced in S 684A and H 5853. The analysis appears to suggest that by making core forest ineligible for solar siting incentives it will increase the cost for leasing or purchasing other sites for solar development. However, that would assume that core forest is currently available for solar siting without limitations and it is not.

38 percent of the core forest in RI is already permanently protected and not available for any development. Most of the remaining core forest is in 16 towns that have adopted ordinances to prevent utility scale solar development by right. The following 10 towns do not allow utility scale solar development in residential zones, unless there is a previously developed or disturbed site such as a gravel bank or landfill: Burrillville, Charlestown, Exeter, Hopkinton, Little Compton, Richmond, North Kingstown, South Kingstown, Tiverton and West Greenwich. Coventry, Foster, Glocester (has standards to limit forest loss), North Smithfield, Scituate, and Westerly (prohibited in most residential zones) do not allow utility scale solar development in residential zones by right and require a special use permit, which requires a public hearing to assess the site specific impacts to the town and consistency with the community comprehensive plan. Moreover, these towns also have lot coverage requirements in residential zones ranging from 10-15%, that would significantly

reduce the allowable foot print for solar. There's not much, if any, core forest in commercial or industrial zones. So, the aforementioned **bills will not protect much, if any, core forest.** It's important to understand that municipalities are not anti-solar. They have adopted responsible solar siting ordinances to encourage solar in appropriate locations and limit and prevent utility scale solar in residential zones. Utility scale solar is a manufacturing use that is not considered to be compatible in residential zones. Solar in residential zones is also displacing land needed to meet RI's housing crisis. Therefore, the analysis of removing core forest land for siting solar should be revisited. The majority of the core forest is also located in remote undeveloped areas outside RI's urban services boundary. It's likely the cost for interconnection to the grid is higher in these locations than sites close to higher population densities. That could be a cost deterrent for siting solar in core forests.

Thank you for the opportunity to comment. Please don't hesitate to contact me if you have any questions.

Sincerely,

Scott Millar  
Director, Community Assistance and Conservation  
Grow Smart Rhode Island