



CITY OF CONCORD

New Hampshire's Main Street™
Conservation Commission

August 9, 2019

The Honorable Jim Bouley
Concord City Council
City of Concord
41 Green Street
Concord, NH 03301

Re: Proposed Solar Ordinance

Dear Mayor Bouley and City Councilors,

On June 10, 2019, the City Council held a public hearing regarding proposed amendments to the City's Zoning Ordinance and Site Plan Regulations that will regulate the location and size future solar energy facilities in our City. The Conservation Commission's comments on that proposal are set forth in our letter to the Planning Board dated February 20, 2019, which is attached here for reference.

We understand that there is a recommendation to amend the proposed solar ordinance to allow solar facilities up to 50-acres in size, doubling the 25-acre cap previously proposed and on which public testimony was heard on June 10. Although the proposed solar ordinance, including this possible amendment, is of interest to the Commission for the reasons set forth in our February 20 letter, the Commission will not have an opportunity to meet and discuss this revised proposal until our next regularly scheduled meeting on August 14. We hope the timing of the Council's consideration of this proposed amendment will allow for such further discussion and comments based on a better understanding of how doubling the size cap to 50-acres will impact the City's landscape and valuable natural resources, particularly in the RO District.

In the meantime, the proposed increase in size cap from 25 acres to 50 acres raises the following initial questions and concerns:

- Much of the City's RO District is forested land. Trees absorb CO² and emit oxygen. Recent studies highlight the importance of both maintaining existing forests and planting additional trees in addressing climate change. Would the siting and construction of a large utility-scale solar facility in the City's RO District require the removal of acres of mature trees (50 acres *or more*)? When required tree removal is considered, would the carbon-reduction benefits of utility-scale solar exceed the loss of the existing benefits from carbon-absorbing trees?

- How will commercial solar facilities impact the City's landscape? As noted in our prior letter, the Vision for Concord as stated in the Master Plan 2030 includes maintaining the City's "essential character," which includes "*an extensive rural landscape including preserved open space, active agricultural lands, and working forests.*" Over the past several years, the City spent an extraordinary amount of time educating itself about the proposed Northern Pass Project, and studying the impacts of that proposed utility project on the City's landscape, natural resources and property values. Although Northern Pass was promoted as a clean energy project because it would carry hydropower from Quebec into New England, the City ultimately opposed the proposed project because of the adverse impacts. We should likewise consider the impacts of amending our zoning ordinance to permit commercial, utility-scale solar facilities in the same RO District that would have been impacted by the proposed Northern Pass Project.
- The Conservation Commission, as stated in our prior letter, supports the City's efforts to promote renewable energy sources. But deciding how to amend our City's Zoning Ordinance with respect to the location and size of large-scale renewable energy infrastructure requires balancing between promoting renewable energy and maintaining the "essential character" of our more rural areas and protecting valuable natural resources, as guided by the current Master Plan. Once we understand the potential impacts of allowing utility-scale solar up to 50 acres in size in rural areas of the City, the Commission will be able to provide informed comments on the revised proposal. It may also be helpful for the City Council to allow for further public comment on the doubling of the proposed size cap prior to its decision on whether the proposed size increase strikes the proper balance for our entire community.
- In accordance with the City's Renewable Energy Resolution, the Energy and Environment Advisory Committee (EEAC) has been charged with coordinating the preparation of a strategic plan to help Concord achieve its renewable energy goals, with public input. The results of that ongoing process may inform the discussion regarding the size cap. Should that strategic plan be completed so that it can be considered prior to any decision to double the proposed size cap to 50 acres?

As before, we appreciate all of the time and effort that is going into this process and the opportunity to participate in this important dialogue.

Sincerely,



Kristine S. Tardiff, Chair

Attachment: Conservation Commission Letter, dated Feb. 20, 2019