



Board

Christine Andreae
Warren County

Seth Coffman
Shenandoah County

Joan Comanor
Shenandoah County

Sarah Francisco
Augusta County

Dolly Frazier
Rockingham County

Lee Good
Rockingham County

Rod Graves
Page County

Cory Guilliams
Rockingham County

Joe Lehnen
Shenandoah County

Carolyn Long
Shenandoah County

Lisa Anne Hawkins
Rockingham County

Robert Whitescarver
Augusta County

John Hutchinson
Advisor

March 31, 2019

Board of Supervisors
Page County
103 S Court Street, Suite F
Luray, VA 22835

Re: Special Use Permit Requests from Dogwood Solar, LLC and Cape Solar, LLC

Dear Chairman Phenix and Members of the Board:

We are writing on behalf of Alliance for the Shenandoah Valley and the Shenandoah Valley Battlefields Foundation.

Please find enclosed "Utility-Scale Solar Ordinance Recommendations," compiled by our organizations to help localities prepare for utility-scale solar proposals. These recommendations were drafted after looking at utility-scale solar projects across the state, reading local ordinances, policies and analyses, interviewing experts and local officials and meeting with a potential developer and leasing landowners. As we describe in the white paper, the construction phase of a utility-scale solar project may be like nothing many rural localities in the Shenandoah Valley have seen, and the scale and longevity of the use call for careful evaluation.

While our organizations do not take formal positions in support or opposed to individual solar projects, we do strongly encourage localities to adopt Comprehensive Plan language and siting guidelines prior to considering large-scale applications.

With that in mind, we were disappointed to learn that a majority of Board members voted that the solar applications were substantially in compliance with the Comprehensive Plan, overturning your Planning Commission. We understand there are two committees currently working to prepare for potential solar development--- the subcommittee working on amendments to the Comprehensive Plan and a concurrent subcommittee working on potential zoning ordinances changes. We also understand that the Northern Shenandoah Valley Regional Commission is conducting research into planning documents and fiscal impacts for localities in its region.

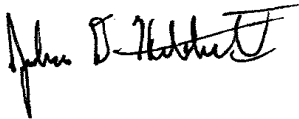
These are necessary and important planning processes, and they will help ensure that solar development minimizes negative impacts to valued local resources, takes into account the vision and values of the community, and does not overly burden Page County.

We urge you to wait for these planning processes to be completed and to make the necessary updates to planning documents *prior to* considering specific proposals. Accordingly, we encourage you to reconsider your premature finding that the Urban Grid proposals are consistent with this Comprehensive Plan. Finally, we encourage you to impose a moratorium on considerations of any proposals until the planning processes are complete.

Thank you for taking our comments into consideration. We offer our support as Page County continues to prepare to carefully consider utility-scale solar development.



Kate G. Wofford
Executive Director, Alliance for the Shenandoah Valley



John D. Hutchinson V
Director of Conservation, Shenandoah Valley Battlefields Foundation

Enclosure: Utility-Scale Solar Ordinance Recommendations, March 2019