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September 30, 2021

Page County Administration
103 S. Court St.
Luray, VA 22835

September 30, 2021

Dear Page County Staff, Administration and Government Officials,

Alliance for the Shenandoah Valley is following the Page County solar ordinance process closely. As you know, the Dogwood Solar special use permit was approved prior to adoption of a solar ordinance, so now I urge the County to strive for the best possible outcome for this project.

The County has the ability and the responsibility to ensure that Erosion and Sediment and Stormwater Management standards are upheld as the project is constructed. In particular, I strongly recommend requiring that the applicant do the following:

- Provide large-scale topographic maps that show clearly every detail of the planned construction.
- Describe fully the actual equipment, surface of roads, buffer plans, and vegetation plans.
- Delineate on the map the location of all features including areas under panel, areas within the fence, property lines, cables, structures, roads, access points, etc.
- Describe and delineate all areas of planned land preparation. Limit the amount of grading, including any removal of topsoil.

In addition, I urge the County to do the following:

- Specify that any disturbance deeper than one inch is considered disturbed land.

- Phase the construction: Determine a limit to how much land can be disturbed at one time (I suggest a “pod” of 20 - 50 acres maximum; this should be sized to the capacity of staff for inspection. Even a few acres of disturbed land can cause erosion and sediment control problems if not carefully managed).
- Consider the solar panels to be impervious surface area.
- Require that all limits of disturbance be flagged off with a correctly-installed silt fence.

In addition, Page County can and should prepare for the extra cost and type of professional services needed, since this scale of construction will be far beyond the capacity of a locality of Page County's size. Adjust fee schedules and require that the developer pay for third-party consultants to review plans and to provide inspections.

These are all strategies recommended from the experience of localities in Virginia. We would be happy to offer examples, contacts and reference materials.

As this will be the first utility-scale solar project ever in Page County, I hope it can be the best project possible, in the absence of the ordinance. There are extenuating circumstances on this site including sinkholes, a drainage area, proximity to the Shenandoah River and sloping land that make this a project that requires particular scrutiny.

Thank you for your dedication to protecting Page County's water quality by enforcing appropriately stringent erosion and sediment control and stormwater management measures for this project.

Chris Anderson

Page and Warren County Coordinator
Alliance for the Shenandoah Valley