For public release

August 23, 2022

Canandaigua – New Michigan Solar, LLC
Canandaigua – CR30 Solar I, LLC
Canandaigua – CR30 Solar II, LLC
c/o Distributed Sun LLC
1425 K St. NW | Suite 701
Washington DC 20005

Town Planning Board
c/o Town of Canandaigua
5440 Route 5 & 20 West
Canandaigua, NY 14424

RE: Sketch Plan Review for CPN#22-054- Stockwell, CPN#22-055- Diprima

Members of the Town Planning Board,

My name is Chet Feldmann, and I am the Director of Engineering for Distributed Sun, the partner company to the referenced project companies in our application and an experienced renewable energy projects developer in New York State. Distributed Sun has been active in New York State since 2012 and completed the first megawatt-scale project in Ontario County in the Town of Seneca with Cornell University. We also recently brought online approximately 100 acres worth of solar arrays in Livingston County in coordination with MRB Group, the Town Engineer for the Town of Mount Morris, a representative of whom I understand is present this evening.

My agenda here tonight is to present two proposed solar projects to the Town Planning Board for a Sketch Plan Review. However, having engaged in discussion with Town Staff and in receipt of the findings of the Agricultural Advisory Committee, I ask that the Planning Board take no binding decision with respect to our project. As is, the projects would fail a key element of the "loss of valuable agricultural lands" clause of the requirements for a Special Use Permit in the Town of Canandaigua based on a review by the Agricultural Advisory Committee. I do ask that the Planning Board engage in a dialogue as to what constitutes "loss" and what constitutes "value."

On the topic of loss, Distributed Sun disagrees that conversion of lands into solar represents a permanent loss of addressable land. By way of doing business in New York and more specifically participating in programs led by New York State Energy Research and Development Authority ("NYSERDA"), Distributed Sun is a signatory to New York State Department of Agriculture and Markets ("NYSDAM") Guidelines for Solar Energy Projects – Construction Mitigation for Agricultural Lands ("Guidelines"). The Guidelines are a prescriptive and monitored program to ensure that no deleterious effects are commenced upon construction and that full re-instatement of any project following the completion of operation is a firm requirement. Distributed Sun, as a responsible steward for energy and the environment, willingly signs up to these requirements to ensure long-term sustainable energy goals to ensure land is not lost as it may be on a more invasive energy type.

Furthermore, and perhaps of more importance, Distributed Sun is a leader in dual-use or "agri-voltaic" implementations on solar projects. Through its collaboration with Cornell University, Distributed Sun has deployed sheep as a means for vegetation management since 2014. Foundational research for the American Solar Grazing Association[1] was performed at facilities developed and built by Distributed Sun. A landowner partner in Tioga County recently added sheep to his array to gather additional revenue. In our recent work in Mount Morris and in coordination with MRB Group, we installed pollinator-friendly grasses at our facility to encourage full ecosystem support for pollinators to thrive and support agriculture in that area. We are seeking beekeepers who may want to collaborate. Thus, while Distributed Sun will be producing emissions-free electricity, our projects will also be agriculturally productive and not, in fact "lost."

On the topic of "valuable agricultural lands", Distributed Sun cannot claim to be greater experts than the greater Canandaigua agricultural community with experience and science on agriculture. However, Distributed Sun has very useful parallel experience in innovating a new product or service in a very developed market of regulated market electricity provision and talking about value. Distributed Sun provides emissions-free local electricity to those willing to purchase it. To be clear, this type of energy costs more to build up front, but with policy support and long-term financial outlooks, this service can be provided at cost competitiveness to what is available today. This service differs from the electrons coming into this room with iotas of embedded pollution from uranium, sulfur, nitrogen, mercury, methane or other pollutants that are blissfully - to Canandaigua residents - far from here. Regardless, an electron is needed to light up the lights in this room, and it can come from any source.

In a parallel thought process, a kernel of corn can nourish a human body or maybe support an animal product for consumption. As agricultural experts here will know far better than Distributed Sun, using additional terms like "genetically modified" or "local" or "organic" can change the consumers perception and importantly, assessed value of that product. Thus, the Town of Canandaigua's laws may be reinforcing value to existing stakeholders, which seem to be very productive and efficient crop farmers, but they may not be permitting value to alternative agriculture – or alternative energy, for that matter.

As a reminder, Distributed Sun has already agreed to compensate the tax authorities for any change in use on land, as well as NYSDAM directly for these projects.

To sum it up, Distributed Sun is conscientiously working on a project that neither constitutes a loss nor devaluation of Canandaigua farmlands. Thus, I repeat my request to hold off on any project decisions, allow our team to re-present the projects, and share your thoughts on the record for our future consideration.

Thank you,

Chet Feldmann
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[1]The agricultural, economic and environmental potential of co-locating utility scale solar with grazing sheep, Kochendoerfer, Nikola, Hain, Lexie, Thonney, Michael L. available at: https://solargrazing.org/wp-content/uploads/2021/02/Atkinson-Center-Full-Report.pdf