
SIMSBURY CLEAN ENERGY TASK FORCE

TO: Lisa L. Heavner, First Selectwoman

FROM: Simsbury Clean Energy Task Force (*Bob Beinstein, Bill Butler, Regina Pynn, Jim Ray, Mark Scully, and Susan Van Kleeff*)

SUBJECT: Evaluation of Tobacco Valley Solar Project

DATE: August 1, 2017

CC: Simsbury Board of Selectmen (*Mike Paine, Cheryl Cook, Elaine Lang, Chris Kelly and Sean Askham*), Tom Roy, Simsbury Director of Public Works

This document responds to the Board of Selectmen's requests, dated July 3 and July 7, 2017, for the Simsbury Clean Energy Task Force (CETF) to evaluate the Tobacco Valley Solar (TVS) Project. We very much appreciate the opportunity to participate, and we offer our input in the following pages. We have focused on areas which the CETF deems relevant to its charter. Our evaluation contains the following sections:

1. Executive Summary
2. Background
3. Deepwater Wind (DWW) Petition Evaluation
4. Addressing Local Questions and Concerns
5. Suitability of Site
6. Recommended Points of Negotiation with DWW
7. Conclusions

Appendices:

Appendix A: Review of Literature Related to Solar Farm Impacts

Appendix B: Additional References

1. Executive Summary

TVS is an approximately 26.4 megawatt (MW) AC solar PV project proposed for several parcels of land in the north end of Simsbury, procured as part of a tri-state clean energy RFP process. The project is planned for 159 acres of a total 289-acre site currently zoned for a combination of residential and industrial uses. DWW submitted a petition for this project to the Connecticut Siting Council (CSC) on June 29, 2017.

TVS will provide utility-scale input of clean energy to the New England regional electric grid, clearly a desirable outcome, and one with the potential to increase electricity supply in Simsbury. However, as currently structured, there are a number of issues that concern the CETF. Based on our detailed review of DWW's CSC petition, these include:

- Financial aspects: Method of providing financial assurance for decommissioning is unclear, and apparent periodic reviews of the TVS project's ability to sell its generated power may create a financial risk to Simsbury.
- Details on how DWW will protect abutters' property (view sheds, project setbacks, etc.) are lacking.
- Specifications on site lighting are not provided, raising concerns about skyglow and night time ambient light levels.
- Details on historic property preservation are limited.

Members of the community, including abutters to the site, have raised a number of concerns including glare, noise, health impacts, home values and others. The CETF performed a literature review and consulted with outside experts to evaluate these concerns, and can find no evidence of negative impacts in these areas. Details are provided in the following sections.

The CETF is excited by the potential for Simsbury to host the TVS project, but is very focused on maximizing the benefits TVS can bring to the town. In Section 6 below, we recommend that the BoS negotiate improvements in the project with DWW. Overall, CETF members support the TVS project. We all recognize the extremely important benefits of clean energy projects, however, some of our members feel strongly that the project requires changes to gain their unqualified support. These include:

- Decreasing the project's active size to increase setback distances from abutters
- Design site lighting to ensure the site will not create skyglow during night hours.

Details on these, and other recommended modifications are provided in Section 6.

2. Background

TVS is an approximately 26.4 megawatt (MW) AC solar PV project proposed for several parcels of land in the north end of Simsbury. In response to the New England Clean Energy RFP, which solicited proposals to site clean energy generation facilities, Deepwater Wind (DWW) proposed this project and was one of

the bidders selected for contract negotiations. The Connecticut Department of Energy and Environmental Protection (DEEP) joined this procurement process together with Massachusetts and Rhode Island. DEEP was authorized to take this step by two public acts. Public Act 13-303 entitled *An Act Concerning Connecticut's Clean Energy Goals* which states the "Office of Consumer Counsel and the Attorney General, may, in coordination with other states in the region of the regional independent system operator....solicit proposals, in one solicitation or multiple solicitations, from providers of Class I renewable energy sources..." Public Act 15-107, entitled *An Act Concerning Affordable and Reliable Energy*, aims "...to secure cost-effective resources to provide more reliable electric service for the benefit of the state's electric ratepayers and to meet the state's energy and environmental goals....".

Projects chosen through this RFP will support the production of renewable energy and the resiliency of the grid throughout New England regardless of which utility purchases the energy. Eleven projects were selected in this procurement process, representing 460 MW of generation capacity. Roughly two-thirds of this total comes from nine solar projects and one-third from wind. To put the size of the nine winning solar projects in perspective: four have an estimated generation capacity of 50 MW each, TVS is proposed at 26.4 MW and four are 20 MW each.

Since the project was formally announced in Simsbury in May 2017, a host of concerns have been raised. These include the suitability of siting a utility-scale facility in close proximity to residences, concerns about lack of local land-use controls over such projects, and tensions between the desire to preserve forests, farms, and open space and the need to decarbonize our energy supply chain, among others. A vocal group of residents, including many living near the project site, has organized to directly oppose the project on these and other grounds.

Separate from TVS, the CETF began work in 2016 on what is being called the 100% Simsbury Project. This has been described as a "concept car of our energy future" and comprises an aspirational, high-level plan to transition Simsbury to 100% renewable energy by 2050. The goal of the project is to first demonstrate the feasibility of transitioning Simsbury to 100% renewable energy, then work collaboratively with the town's residents, businesses and officials to achieve this plan. This plan goes beyond simply generating, procuring or offsetting energy needs with renewable sources. Rather, it represents a holistic, comprehensive approach to managing the supply and demand for energy, including:

- Deep efficiency and conservation
- Generation of renewable energy
- Energy storage
- Electrification of transportation, heating, and cooling
- Active load management (i.e., "demand response")
- Localized electric microgrid(s)

Should 100% Simsbury continue along the path to successful implementation, the presence of TVS could be important to several of the bullets above, particularly the energy storage and local microgrid aspects. It is worth noting that these two aspects alone can have significant positive impacts here in town, including greater resiliency during power outages and storms, and an improved image of the town as a

clean energy community, which can be important to climate-conscious residents and potential residents or businesses considering locating in Simsbury.

As noted above, TVS has an estimated generation capacity of 26.4 MW. To put this figure in perspective, Simsbury currently has roughly 150 rooftop solar arrays with a combined capacity of 1.7 MW. (Over half of these arrays were added through the Solarize campaign the CETF conducted in 2014.) When compared to early estimates of our current energy use, it is clear to us that the potential of rooftops, carports and landfills is limited. In fact, approximately 140 MW of generation capacity, preferably from renewable sources, will be required for Simsbury to meet its current energy needs. Moreover, this amount could increase significantly in the years ahead, should residents choose to switch to electric heating/cooling and vehicles. It is clear to the CETF that, although TVS can be an important part of Simsbury's energy future, it would be a mistake to consider this project in a bubble that fails to recognize the surrounding context.

3. Deepwater Wind Petition Evaluation

We have reviewed in full the DWW petition to the Connecticut Siting Council (CSC), requesting a Declaratory Ruling that a Certificate of Environmental Compatibility and Public Need (CECPN) is not needed for the construction, operation and maintenance of the Tobacco Valley Solar Project. The petition demonstrates significant efforts and commitments to meet and or exceed state requirements for such facilities, as well as a substantial amount of background research supporting their request. Following are some observations and points on which we recommend the BoS seek clarification during the CSC process.

- **Decommissioning:** Exhibit S discusses DWW's proposed plan for end-of-life decommissioning and equipment removal, along with methods of providing financial assurance that such decommissioning will be achievable. Decommissioning has been frequently raised as one of the community's concerns. The CETF specifically identified the following concerns:
 - DWW plans to rely on salvage value to fully fund end-of-life site restoration, stating that, *"...the cost of decommissioning the solar arrays will be offset by the salvage value of the solar panels and components. As of the date of this plan, the estimated salvage value is expected to exceed the decommissioning costs..."* Yet, their plan also anticipates that advances in solar technology over the 20-25 year project life will *"...economically drive the replacement of the existing solar arrays."* As such, it seems likely that the existing panels will be rendered obsolete, with little salvage value. It is also worth noting that solar panels and support structures contain components with intrinsic material value (silica, silver, aluminum, etc..) that can be recovered upon decommissioning, assuming proper supply chains are established through which the economic value of these materials can be realized. However, DWW has not provided any detail as to how panels will be handled at project end-of-life. **Absent full knowledge of the end-of-life value of the panels, how will DWW ensure adequate funding for eventual decommissioning?**
 - DWW has specified a process to annually provide financial assurance in the form of a performance bond, surety, letter of credit, or similar, equal to 1/10 the provided decommissioning estimate. This means that the decommissioning fund would not be

fully funded until 10 years into project. **What protection is there for the town if DWW fails earlier than this time? Is the ultimate parent company for DWW (D.E. Shaw group) legally and bindingly committed for liability in general and early termination specifically?**

- Further, how does DWW plan to balance the provision of financial assurance with their contention that salvage value will exceed decommissioning cost? **How will the town be protected against site decommissioning costs throughout the life of the project?**
- **Project Layout:** In the Petition, pg. 19, DWW outlines an 18.2-acre reduction in the project layout made in response to feedback from abutters. The size of the project layout is still a concern to many abutters, town residents and some members of the CETF. **Will DWW commit to minimize the project area to the maximum extent possible, consistent with constraints of the RFP, contractual agreements, and the ecological integrity of the site? Further, will DWW commit to focusing such reductions on increasing the buffer between abutters and the active solar collection devices?**
- **Historic Properties:** Exhibit M (pgs.32-33) recommends that the view shed from the historic properties at 85 and 100 Hoskins Rd be protected, however these sites are not addressed in the visibility assessment (Exhibit G of the petition). **Will DWW commit in writing to protect these properties from view?**
- **Lighting:** Exhibit Q (pg. 4) states *“The facility will be lit in accordance with electrical safety and building codes and to minimize Project visibility”*. **Will DWW commit to an environmentally friendly lighting plan that avoids skyglow, and minimizes ambient light to avoid impacting abutters?**¹
- **Clearing FCA:** In the Petition, pg. 6 mentions that the “Forward Capacity Market procurement mechanism is the way by which this electricity will be generated. The proposal states *“TVS is required to participate in every FCA over the term of its PPA, and is expected to clear each year. If TVS clears in any FCA, then ISO-NE (and, by proxy because TVS will be in a zone that includes Connecticut, Connecticut load-serving entities that are participants in ISO-NE) will have determined TVS to be needed for the reliability of Connecticut and the wider New England market.”* This sounds like the agreement to sell electricity is under periodic review. **What happens if the TVS project does not “clear” FCA? Will the project in that case generate the funds required to sustain activities and meet its maintenance and tax obligations?**
- **State Energy Goals:** In the Petition, pg. 7, there is a discussion of the state’s long-range plans. The petition seems to double-dip in how it meets energy generation metrics for both MA and CT. It is unclear where the real “accounting” benefit for this green energy generation really is. **Can DWW confirm that it can take credit for meeting goals in both states?**
- **Pollinators:** In the Petition, pg. 49, DWW commits to planting a up to one acre of native pollinator seeds as a pilot. Over the 20-year life of the project, results of the pilot project will become well known. **Will DWW regularly evaluate the diversity of pollinator-friendly plant species in the demonstration plot and consider expanding the demonstration plot if feasible?**

¹ Guidance on avoiding skyglow is provided by the International Dark-Sky Association, at www.darksky.org.

Further, will DWW confirm that overall ground cover will be pollinator friendly across the site?

We note that Fresh Energy, a Minnesota NGO (www.fresh-energy.org) has specific expertise in implementing pollinator-friendly ground cover on utility-scale solar sites, and recommend DWW consider engaging them or a similarly qualified NGO on this issue.

4. Addressing Local Questions and Concerns

During attendance at public meetings regarding TVS we noted many of the concerns expressed by the attendees, and have tracked those that the CETF believes are relevant to our task force's mission. These are:

- Potential for glare to impact airplanes
- Impacts on home values
- Effect of electromagnetic fields on health
- Solar PV heat island effect
- Toxicity of solar panels and potential for resulting environmental contamination
- Noise pollution

While the members of the CETF are advocates for clean energy, we are not experts in solar technology, nor do we have significant experience with utility-scale solar farms. As such, we sought scientific studies published in peer-reviewed journals or from professionals with verified relevant expertise to inform ourselves and others. It should be noted that although DWW provided significant scientific evidence in its petition, we chose not to rely solely on these studies, due to the potential for bias. We searched both individually and with the help of Dr. John Gardner, an energy expert at Boise State University. Based on these efforts, we concluded that existing evidence does not support the concerns expressed to date.

While we respect the right of any resident to be concerned about a specific topic, we believe a reading of Appendix A to this letter and the references listed in Appendix B will provide confidence to the Board that the issues listed above should **not** preclude the BoS from supporting the TVS petition.

We recommend the interested reviewer read all the reference literature. To streamline review, however, we direct you first to the literature review provided by Dr. Gardner (Appendix A) which offers a summary on key concerns from Simsbury residents, including information on the first four bullets above. Below, we have summarized some additional findings both from Dr. Gardner and from other sources beyond what Dr. Gardner covered.

Glare – Aviation

Dr. Gardner noted reasons why solar panels are not a concern to aviation. In addition, DWW submitted the required notice of proposed construction to the FAA. On April 18, 2017, the FAA provided a determination of “no hazard to aviation.” The determination is included in Exhibit R of the DWW petition to the Connecticut Siting Council.

Toxicity of Solar Panels

There are two types of solar panels used for utility-scale solar projects – silicon and thin film. The panels are made to last for 20 to 25 years and the construction of both types is engineered to be free of corrosion and strong enough to withstand weather events that could cause damage. For this reason, the panels are encased in layers of plastic and tempered glass. No substances within the panel can leach into the environment. During Hurricanes Matthew and Sandy large-scale solar facilities reported zero to only minor damage.²

Noise Pollution

Inverters at utility-scale solar farms hum during the day when electricity is being produced. Research at three utility-scale solar farms in Massachusetts found that noise levels at the fenced boundary were equal to background levels. At 50 to 150 feet inverter hum was inaudible³. The DWW petition states that “The setback distance for the perimeter fence will be approximately 75 feet, on average, from the adjacent property lines. However, based on discussions with individual residents and stakeholders, additional setbacks were established in certain locations to minimize project visibility and tree clearing. These adjusted setbacks range from an additional 50 to 300 feet in an effort to maintain the existing vegetative buffer between residential properties.” Since the perimeter fence is at least 50 feet from the inverters and most likely more than 50 feet, because the proposed location for the inverters is near the center of the solar voltaic cells, there doesn’t appear to any evidence that the Tobacco Valley Solar Farm will create noise pollution. The study commissioned by DWW states that the “mechanical equipment are expected to have no adverse noise impacts at nearby sensitive receptor locations during both daytime and nighttime periods.”

5. Suitability of Site

From a bidder’s perspective, the site chosen by DWW is nearly perfect. Proximity to a substation, the abundance of available acreage, and relatively little removal of trees all make this site an excellent choice. From the Town’s perspective, the site has challenges. Other than the revenue it will generate (the importance of which we recognized and appreciate), DWW has not explicitly committed to creating ancillary benefits for Simsbury. In addition, residents have rightfully expressed their concerns about impacts of having a utility-scale solar farm near their homes, which include changes in the appearance of a designated scenic roadway and the potential for property values impacts. While the CETF’s default is strong clean energy advocacy, as currently structured, the suitability of this site for the TVS project is uncertain. We discuss this in more detail below.

6. Recommended Points of Negotiation with DWW

The CETF recognizes that the TVS project is very likely to be approved as submitted. That said, DWW has shown at least some willingness to make changes in the interest of being a “good neighbor.” From our perspective as clean energy advocates, we want this project to succeed holistically, creating as many co-benefits for Simsbury as reasonably achievable. The more benefits we can obtain, the more enthusiastic our support will become. Given the size and scope of this project, it seems reasonable that DWW will be willing to entertain easily implemented requests from Simsbury to increase benefits to our town without

² Health and Safety Impacts of Solar Photovoltaics, NC State

³ Study of Acoustic and EMF Levels from Solar Photovoltaic Projects, Tech Environmental Inc.

greatly increasing costs to DWW. Below, we've listed several desirable outcomes we recommend the BoS propose. We stand ready to help with this task, and to work with DWW to structure these improvements. Please note that resolving the first two bullets listed below is considered critical by some members of the CETF, significantly impacting their full support for this project.

- Significantly shrink the project's physical footprint while maintaining the currently planned level of ecological protection. Further, the land removed from active energy production should be that closest to abutting residents, increasing the buffer between their homes and TVS, alleviating at least some of the abutting neighbors' concerns, and potentially minimizing views of the active solar field from Hoskins Road.
- Ensure site lighting does not create "skyglow" during night hours, consistent with guidance from the International Dark-Sky Association (see notes on lighting in Section 3).
- Ensure that DWW maximizes pollinator-friendly planting across the site, whether from the proposed 1-acre pilot or included in site ground cover.
- Add specific educational features to the project. These can include:
 - Placarded signage offering information about the potential benefits and impacts of solar energy along the walking trail already planned
 - A web-based portal for use in Simsbury Public Schools (SPS), enabling students to view real-time information about energy being produced from TVS. Secure DWW commitment to assist SPS staff in developing age-appropriate curriculum for elementary, junior high, and high school students.
 - Host tours for the community, enabling local residents to better understand how the installation works.
- Commit to meeting with local residents periodically throughout the project lifecycle (or until such meetings are no longer well attended), to learn of any post-construction challenges observed, and work on mutually beneficial solutions.
- Provide additional details on the planned walking path(s). Except for a cursory mention on pg. 13 of the petition, there was no more discussion about the walking path. Details should include where the path will be located, how people will access it, and how it will be constructed.

7. Conclusions

The TVS project represents an exciting step toward bringing additional clean energy and energy supply reliability to Simsbury, but to ensure a positive outcome for our town, significant challenges remain. We've provided details above. We recommend the BoS work with DWW to address and resolve these challenges to both parties' mutual benefit. The CETF stands ready and willing to work with the BoS to maximize benefits to Simsbury from this project.

Appendix A

REVIEW OF LITERATURE RELATED TO SOLAR FARM IMPACTS

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July 2017

INTRODUCTION

As is often the case with new development and land use changes, there are often concerns about the development of a utility-scale solar farm, particularly by those who live nearby. The purpose of this document is to review the body of literature related to these concerns and better inform the discussions around these issues by documenting the facts as best we can.

OVERVIEW OF CONCERNS

The National Renewable Energy Laboratory, located in Boulder, CO, was established in 1977, initially to investigate ways to better harness solar energy. Today NREL sees its mission to advance “the science and engineering of energy efficiency, sustainable transportation, and renewable power technologies and provide the knowledge to integrate and optimize energy systems”⁴. Like all the Department of Energy Labs, NREL is specifically forbidden to engage in policy advocacy but maintains a robust research program to help policy makers and citizens understand the technical, economic and social implications of technology and policy that incentivize, or discourage various technologies.

Part of NREL’s mission is to aid state and local governments as they seek to make policies and decisions involving solar energy. The Technology Deployment division has a nice overview of some common misunderstandings around solar installations, specifically addressing these concerns that they define as “Myths”.^[1]

1. Solar farms are like factories
2. Glare
3. Noise
4. Property Values
5. Electro-magnetic Fields

In the remainder of this document, we will dive a little deeper into the issues of glare, property values and EMF’s as well as the issue of urban heat islands.

GLARE

Overview: It’s important to note that the main purpose of solar panels is to absorb the energy of light and convert it into electrical energy. They are not designed to reflect light. Early designs of solar panels were

⁴ <https://www.nrel.gov/about/mission-programs.html>

covered with standard window glass which could be highly reflective, but modern PV panels have low-glare covering. There are two important issues to note regarding glare and PV panels:

- 1) Solar panels on fixed (non-tracking) mounts generally point due south and are tilted up from the horizontal at an angle equal to the latitude at that location. This is the orientation at which their production is maximized. At that angle, it is literally impossible for an observer at ground level to experience a direct reflection from the sun at any time of the day or year.
- 2) The FAA and airports were initially opposed to solar panel installation near airports but that is no longer the case. There are several major US airports with significant solar installations that have operated for years without incident.⁵

In recent years, two government agencies, the Department of Energy and the Federal Aviation Administration have commissioned studies and issued reports and guidelines for solar installations near airports. DOE's National Renewable Energy Lab issued a report in 2014 that concluded "with proper advanced planning and siting considerations, solar technologies can successfully be installed at airports with minimal or no impacts".^[2] The FAA has issued, and continues to update, an extensive set of guidelines to both encourage the implementation of solar energy at the nation's airports and to ensure they are done in a safe manner.^{[3], [4]}

HOME/PROPERTY VALUES

Property values are always a concern when changes are made to historic land uses and local residents are rightly concerned when large, visible changes are made in their vicinity. Additionally, it's important to note that property values can have distinctly different meanings in different contexts. On one hand, if an individual does not like the impacts or a nearby installation, whether it be due to noise, odor or visual appearance, they would likely not purchase a property nearby. If the installation in question comes along near their existing property, they are likely to feel that the value of their property is decreased. Clearly, this is a highly subjective context and difficult to study. On the other hand, property value can have very specific and objective meaning – the value of the property on the open market. In other words, what is an owner likely to receive when selling that property? That context is objective (in that data exists for real estate transactions) and open to study.

While we are aware of no studies done on the impact of utility-scale solar installations on the property values of nearby homes, the question of the impact of utility scale wind turbines has been studied extensively. In a landmark and extensive study, researchers at the Lawrence Berkeley National Lab study data from more than 50,000 home sales in 27 counties and 9 states. All of these homes were within 10 miles of utility scale wind farms, and nearly 1200 were within one mile. Their methodology controlled for all known factors affecting property values (e.g. home size, construction, age). Researchers could find "no statistical evidence that home values near turbines were affected".^[5]

Pertinent to the situation of solar farms, it is important to point out that in nearly every characteristic, wind farms are much more intrusive and hence more likely to negatively impact property values than solar farms. Wind turbines are visible for 10 miles or more and can be heard from more than a mile away. They can also produce flickering shadows near dawn at dusk that can be very distracting and unpleasant. Solar farms cause

⁵ <https://www.solarpowerworldonline.com/>

none of these impacts. In fact, it's entirely possible that one could be living much less than a mile from a significant solar farm and be unaware of its existence.

ELECTROMAGNETIC FIELDS

An extensive study was published in the Journal of Occupational and Environmental Hygiene in 2015[6] on the issue of EMF exposure for workers when visiting within utility scale solar facilities (i.e. buildings that house junction boxes, circuit breakers and transformers). The researchers measured actual electromagnetic fields with frequencies from 0 (DC) to 3 GHz using three different sets of instruments and compared their findings with the published guidelines for exposure limits published by both IEEE6 and ICNIRP7. They found the highest measured fields (adjacent to the inverters and transformers) were 2 to 3 orders of magnitude lower (i.e. 100 to 1000 times lower) than the published limits. Furthermore, they found that within in 2-3 m of the equipment, the measure fields dropped to background levels (which are found anywhere). Given that commercial solar farms control public access (a requirement of any commercial generating facility connected to the grid), this paper supports the conclusion that there is no reason to believe that the EMF fields found in and around commercial solar farms pose any kind of health risk to humans or animals.

HEAT ISLAND EFFECTS

Heat islands, more specifically urban heat islands (UHI) refer to the phenomenon where nighttime temperatures in densely developed areas tend to be much higher than in the surrounding, undeveloped areas. The cause of UHI effects are fairly well understood. The man-made structures (buildings and pavement mostly) absorb solar energy during the day and store that energy in the thermal mass (as indicated by the increased temperature of the structures). After the sun sets, that heat is then convected and radiated back out into the surroundings. Since the thermal mass of these structures is generally much higher than the natural materials of undeveloped areas, the release of the heat in the nighttime can go on much longer in cities and hence, the overall temperature rises. Additionally, the lack of natural plant life can contribute to UHI in that plants undergo a process of evapotranspiration, which absorbs heat and can have a cooling effect on the surrounding environment.

There is significant literature dealing with the issue of heat island effects and solar installations. To date, the results of scientific studies are mixed, with one of the most recent studies[7] concluding that there is, indeed, a small and localized impact that can be attributed to solar farms, likely due to the change in plant life in the area.

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⁶ Institute for Electrical and Electronic Engineers (<http://ieec.org>)

⁷ International Commission on Non-Ionizing Radiation Protection (<http://www.icnirp.org/>)

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ABOUT THE AUTHOR: John Gardner has been an engineering professor for over 30 years and is a professor of mechanical and biomedical engineering at Boise State University where he coordinates a major initiative in the Center for Advanced Energy Studies, affiliated with Idaho National Laboratory. He graduated from Cleveland State (BS) and Ohio State (MS, PhD) and spent 13 years on the faculty of Penn State University Park before moving west. John is a fellow of the American Society of Mechanical Engineers and a registered professional engineer in the state of Idaho.

Appendix B

Additional References

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