

STATE OF ILLINOIS     )  
                                  )SS  
COUNTY OF BUREAU     )

In the Matter of the Petition  
                                  of

Ladd Solar 3, LLC  
Hall Township  
Bureau County, Illinois

Testimony of Witnesses  
Produced, Sworn and  
Examined on this 16th day  
of September, A.D., 2024,  
before the Bureau County  
Zoning Board of Appeals

Present:

Troy Quest  
Jim Forristall  
Bill Jensen  
Shirley Ann Smith  
Barry Welbers, Chairman

Cecilia Nemeth, Secretary  
Kristine Donarski, Zoning Enforcement Officer

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1 MR. WELBERS: We're going to reconvene.  
2 We're in recess from Ladd Solar 3 and now we are  
3 not in recess, and we're going to go on.

4 And where we left Ladd Solar 3 was, they  
5 had one more witness to call, as I recall, who  
6 is here.

7 MR. GRANDON: Yes.

8 MS. DONARSKI: Were we going to go back to  
9 2 or were we going to start from 3 and then do  
10 2?

11 MR. WELBERS: Well, we're in recess from  
12 3. So let's do 3.

13 MS. DONARSKI: Okay.

14 MR. WELBERS: Follow me, if you all would.  
15 Please don't get confused. We'll complete with  
16 3 -- we'll un recess from 3, and we'll have this  
17 witness that Applicant has, and then that  
18 witness can be cross-examined by all of you with  
19 respect to Ladd Solar 3.

20 Then we're going to stop for a little bit  
21 and we're going to put Ladd Solar 3 on the  
22 table. We will untable Ladd Solar 2 with the  
23 same witness and the some cross-examination or  
24 whatever other questions come to mind.

1           And then after that, if the Applicant has  
2 anything further, they would go on with it. Or  
3 if they're going to rest after each one, they'll  
4 tell us.

5           Once they are done and all the cross-  
6 examination is done on, first Ladd Solar 3, then  
7 Ladd Solar 2, then we will go to the Interested  
8 Parties, any one of you that want to come up  
9 here, and I know you have got a lot of testimony  
10 and information to present. And so we'll figure  
11 out what order we're going to do that in and  
12 we're going to do it.

13           So right now we are back in session on  
14 Ladd Solar 3. All the rest of us are the same.  
15 John Barcani from the County Board is here  
16 tonight. That's the only change.

17           So go ahead, sir.

18           MR. PLUTA: So I'm only going to do one  
19 opening so you only have to hear from me once  
20 for both the projects.

21           MS. NEMETH: We need to swear you in.

22                               SEAN PLUTA,  
23 being first duly sworn, testified as follows:

24           MS. NEMETH: Please state your name and

1 address for the record, please.

2 MR. PLUTA: Okay. My name is Sean Pluta,  
3 S-E-A-N, P-L-U-T-A. My address is 2806 January  
4 Avenue in St. Louis, Missouri, 63139.

5 My name is Sean Pluta. I'm an attorney  
6 representing the Applicant. As you just heard,  
7 this is a continuation of an evidentiary hearing  
8 for our Conditional Use applications for  
9 projects Ladd Solar 2 and Ladd Solar 3.

10 We are here today to present testimony and  
11 evidence sponsored by Erin Bowen regarding both  
12 projects. Ms. Bowen is a certified real estate  
13 appraiser with the company CohnReznick. She has  
14 prepared and we have provided two reports  
15 documenting the property value impacts of solar  
16 developments on neighboring properties.

17 Those are both your Exhibits 3 and 4 for  
18 both of the projects. They are the both thick  
19 packets.

20 The reports look at available peer-  
21 reviewed research, case studies from similar  
22 projects, interviews and data collected by  
23 county assessors, and conclude that the data  
24 does not support a finding that the proximity to

1 a solar farm presents a consistent negative  
2 impact on adjacent property.

3 I request the Board consider both  
4 Ms. Bowen's testimony and the provided documents  
5 as evidence in this matter.

6 Ms. Bowen, would you like to come up.

7 ERIN BOWEN,  
8 being first duly sworn, testified as follows:

9 MS. NEMETH: Could you please state your  
10 name and address for the record, please.

11 MS. BOWEN: My name is Erin Bowen,  
12 E-R-I-N, B-O-W-E-N. Address is One South Wacker  
13 Drive, Suite 3550, Chicago, Illinois.

14 MS. NEMETH: What's the ZIP?

15 MS. BOWEN: 60606.

16 MS. NEMETH: Thank you.

17 MS. BOWEN: I have also distributed a  
18 PowerPoint presentation, which is just some  
19 visuals and highlights from the larger reports  
20 so we don't have to go through the thick  
21 reports.

22 Good evening. My name is Erin Bowen. As  
23 Sean mentioned, I am a certified real estate  
24 appraiser. I am an MAI-designated appraiser.

1 It's the highest designation for appraisers.

2 I work at CohnReznick. At CohnReznick we  
3 specialize in all types of valuation for real  
4 estate, including specializing in property value  
5 impact studies in which we can determine whether  
6 or not there is an impact to adjacent property  
7 values by a variety of external influences.

8 We have studied landfills, transmission  
9 corridors, big box retail, cell towers, and for  
10 the last eight years we have studied solar farms  
11 and whether or not they may or may not have an  
12 impact on adjacent property values.

13 To research this issue, whether or not a  
14 solar farm has an impact on adjacent property  
15 values, we approach this threefold. The first  
16 of which is to review the published academic  
17 literature out there; the second of which is to  
18 perform our own paired sales analysis; and the  
19 third is to conduct market participant  
20 interviews with county and township assessors  
21 and real estate agents who listed properties.

22 I have mentioned academic studies. There  
23 are a few academic studies that have been  
24 published, including by the University of Rhode

1 Island, the Berkeley National Lab, and the  
2 University of Georgia Institute of Technology.  
3 These studies take a macro approach, in which  
4 they are looking at tens and hundreds of  
5 thousands of data points. They are looking at,  
6 general speaking, properties that have sold  
7 within approximately a quarter mile to a mile  
8 surrounding a solar project and comparing it  
9 with controlled sales located farther away.

10 The University of Rhode Island study  
11 published in September of 2020 looked at 208  
12 solar facilities. They are identified 70,000  
13 test sales and 350 control sales. The study  
14 found that there was no negative impact to homes  
15 in rural locations. And they defined a rural  
16 location as a place with 850 persons per square  
17 mile or less. They also found that there was no  
18 difference based on the size of the solar  
19 facility.

20 The study was followed up by the  
21 University of Georgia Institute of Technology,  
22 which looked at agricultural farmland, and found  
23 there was no direct negative or positive  
24 spillover effect of the solar farm on nearby



1 agricultural land values.

2 So these academic studies are, like I  
3 mentioned, a very macro approach. At  
4 CohnReznick, we take a very micro approach.  
5 Instead of looking at, you know, a radius of a  
6 quarter mile to a mile away, we're looking at  
7 the homes that are directly surrounding the  
8 property.

9 So if you're going to see an impact of the  
10 solar farm, you're going to see it with the  
11 homes that share a property line with it, the  
12 ones that are looking at it either from their  
13 backyard or their front yard. You might have  
14 homes surrounded on two, three or even four  
15 sides. So we are looking at the homes that are  
16 closest to the solar facility.

17 Our methodology that we employ at  
18 CohnReznick is taken from the Appraisal  
19 Institute textbook called Real Estate Damages.  
20 It's written by Dr. Randy Bell. He states that  
21 if a legitimate detrimental condition exists,  
22 there will likely be a measurable and consistent  
23 difference between the two sets of data. If  
24 not, there will likely be no significant

1 difference between the two sets of data. Simply  
2 put: If there's an impact, you're going to be  
3 able to measure it, and you're going to be able  
4 to measure it more than once.

5 What we do is first identify an existing  
6 solar farm. We identify every single property  
7 that surrounds a solar farm and track to see if  
8 there's been any sales of any of those homes  
9 that surround the solar farm after the  
10 completion of the solar project.

11 We then compare any test sales, any homes  
12 that have sold after the completion of the solar  
13 project, to control sales. So we'll identify  
14 the characteristics of that test sale, whether  
15 it might be a 1970s track home or a farmstead on  
16 five acres, and we compare it to other 1970s  
17 track homes and other farmstead properties.

18 And we are looking for control sales,  
19 those homes to compare it to, that are removed  
20 from the solar farm but still have those similar  
21 characteristics with -- that sell within a  
22 similar time frame.

23 We have done this analysis on over 40  
24 existing solar farms across the country. We

1 have looked at solar farms in Illinois, Iowa,  
2 Michigan, Minnesota, Wisconsin. We have looked  
3 at solar farms that are in suburban locations,  
4 rural locations, exurban locations. We have  
5 identified transactions of properties that are  
6 surrounded on two, three, four sides. We have  
7 identified transactions of homes that have solar  
8 within 150 feet of the residence itself.

9 And across all these studies that we have  
10 done we have found that there's no measurable or  
11 distinct difference in property values for those  
12 homes sold next to the solar facility in  
13 comparison to the controlled sales. We have  
14 found that there's no difference in unit sale  
15 prices, or the total sale price, the prices per  
16 square foot, the conditions of sale, the overall  
17 marketability, or days on market. We have found  
18 that there's no reduction in the rate of  
19 appreciation. We have found that solar  
20 facilities do not deter new development.

21 I'd like to highlight a couple of  
22 examples, and I apologize to the members of the  
23 community that don't have the visual aids in  
24 front of them. But to the Board members, there

1 are a couple of maps in here that illustrate  
2 some of the particular examples.

3 The Freeport Solar Farm in Stephenson  
4 County, Illinois, we identified all of the  
5 properties that surrounded the solar facility  
6 and identified two test sales that sold. They  
7 sold for a median price per square foot of  
8 \$77.33 per square foot. And we compared that to  
9 14 controlled sales. So these are homes that  
10 were in similar characteristics, that sold in a  
11 similar time frame, and that were not near the  
12 solar farm. And the median sale price of these  
13 14 controlled sales were \$76.08 a square foot.  
14 Meaning that the test area, the two test area  
15 sales, sold for approximately 1.65 percent  
16 higher. Essentially no difference between the  
17 price per square foot.

18 I have another example here on the next  
19 page of the PowerPoint. This is an example of a  
20 solar farm in Shiawassee County, Michigan, which  
21 is a 239-megawatt facility on over 1900 acres.

22 This particular example is a home that is  
23 surrounded by solar panels on all four sides .  
24 This home sold after the completion of the solar

1 panels in phase one. It sold for \$322,000, or  
2 approximately \$174 a square foot. This home, we  
3 identified seven controlled sales that had  
4 similar characteristics, and those homes sold  
5 for approximately \$165 a square foot, indicating  
6 the home that was surrounded on all four sides  
7 by solar sold for approximately 5-1/2 percent  
8 greater than the homes with similar  
9 characteristics removed from the solar farm.

10 Another home that was located next to the  
11 Assembly Solar Project, I want to point out that  
12 we were able to perform a rate of appreciation,  
13 showing how this particular home sold twice  
14 after the completion of the solar farm. It sold  
15 in May of 2021 for \$215,000, and then a little  
16 bit less than two years later, in March of 2023,  
17 for \$250,000, which means that that was a  
18 16.3 percent increase over approximately  
19 20 months, or if you're looking at that on a  
20 monthly basis, that's a 0.7 percent increase per  
21 month.

22 We compared this to the FHFA Home Price  
23 Index for the ZIP code over the same time  
24 period, and the monthly appreciation rate was

1 0.67 percent, indicating that this home  
2 appreciated at the same rate that other homes in  
3 the area appreciated at.

4 Moving on from our CohnReznick paired  
5 sales analyses. We have conducted market  
6 participant interviews. We have spoken with  
7 over 75 county assessors, over 20 states who  
8 have solar farms in their jurisdiction. These  
9 are representatives who track sale prices of the  
10 homes in their community. And we have  
11 interviewed whether or not they have identified  
12 any trends in sale prices, and they have not.

13 We have asked if they have changed the way  
14 they have assessed those properties being next  
15 to those solar farms, and they have not. And we  
16 have asked if they have been granting any  
17 reductions in assessed values, and they have  
18 not, including numerous county assessors in  
19 Illinois.

20 We have also spoken to real estate brokers  
21 who have listed and sold properties that are  
22 directly adjacent solar facilities, and they  
23 have indicated that they had no issues selling a  
24 property, and that usually when we ask if the

1 solar facility had any impact, these real estate  
2 brokers have indicated that it was not a concern  
3 and it was not brought up in the listing process  
4 at all.

5 In conclusion, our research has indicated  
6 that there is no consistent negative impact that  
7 has occurred to the adjacent property that can  
8 be attributed to the proximity of the adjacent  
9 solar farm. This conclusion has been confirmed  
10 by numerous county assessors and -- who have  
11 also investigated this use of potential impact  
12 on property values and has been confirmed by  
13 academic studies using large sale databases and  
14 regression analyses and shown that there's no  
15 impact on property values.

16 That concludes my presentation of the  
17 data, and happy to answer any questions that you  
18 may have.

19 MR. WELBERS: Do you have some questions,  
20 Kris?

21 MS. DONARSKI: Uh-huh.

22 EXAMINATION

23 BY MS. DONARSKI:

24 Q. That was pretty quick.

1           In looking through your handout here, so  
2           it has you listed as Phoenix, Arizona, on that.  
3           So are you from Illinois or are you from  
4           Arizona?

5   A.    I was born in California, lived in Phoenix for  
6           15 years now, but I work with my colleague,  
7           Andrew Lines, who was born and bred in Illinois.  
8           I have worked with him for over ten years now,  
9           and we work together. He has co-authored this  
10          report. So his name and signature is on the  
11          report as well.

12   Q.    And then you're presenting on his behalf, kind  
13          of?

14   A.    Yes, but I have co-authored and I am familiar  
15          with all of the data within the report.

16   Q.    Thank you.

17                So I just have a question. So are these  
18                studies that you did here in the Midwest, is  
19                there any difference, like, in Arizona or other  
20                parts of the country, or is this consistent on a  
21                nationwide basis?

22   A.    It's consistent on a nationwide basis. The  
23           majority of our research does focus around the  
24           Midwest because that is where a lot of the solar



1 development is occurring, but we have done  
2 studies in Hawaii, Colorado, Florida, Georgia,  
3 Pennsylvania, New York, and we have not seen any  
4 geographic discrepancies, whether in the Midwest  
5 or any of the other locations across the  
6 country.

7 Q. Okay. And so it's your testimony that having a  
8 home next to a solar facility, that the county  
9 assessors do not reduce the assessed valuation?

10 A. Uh-huh.

11 Q. And the sale price you do not feel is  
12 negatively impacted; is that correct?

13 A. Correct. We have done our own paired sales  
14 analyses, in which we have not found a  
15 difference in market sale prices, and then also  
16 confirmed that with county assessors who are  
17 also tracking sale prices, and they have not  
18 found a trend that would indicate that they  
19 would need to change their assessment of those  
20 properties and they have not changed their  
21 assessment of those properties being next to  
22 solar.

23 Q. Okay. In your opinion, would there be a lesser  
24 or a different group of perspective buyers who

1 would be willing to look at a home next to a  
2 solar field versus those who wish not to live  
3 next to them or is this across all of it  
4 together, as a whole?

5 A. We have not found that there has been a  
6 decrease in marketability or a decrease in pool  
7 of buyers. You know, certainly there are some  
8 people who would not buy a home next to a solar  
9 facility, but there are some people who would  
10 not buy a home that has a certain paint color.

11 So I don't say that everybody is required  
12 to love solar, but that does not decrease the  
13 amount of pool of buyers that are looking to buy  
14 these homes next to a solar facility.

15 Q. Okay. Now, have you done any of these type of  
16 studies, like, for homes that are built, say,  
17 next to high lines or anything like this, or is  
18 your scope just on solar farms?

19 A. So our analysis for this particular report  
20 focuses specifically on homes next to solar  
21 farms. We eliminate any studies of solar farms  
22 that may have an additional influence, like  
23 being next to a highway, a rail line, a  
24 transmission corridor, because we're trying to

1 isolate a singular influence.

2 Q. Okay.

3 A. So we have done other studies that are focused  
4 on just transmission corridors and there's no  
5 solar involved. But for the purposes of this  
6 research, we are trying to isolate a singular  
7 potential influence, the solar farm itself, and  
8 remove any potential externalities that may be  
9 having an additional impact beyond just the  
10 solar farm itself.

11 MS. DONARSKI: Okay. Thank you very much.  
12 That's all my questions.

13 MR. WELBERS: Who would like to ask  
14 questions first? Chris Noll.

15 EXAMINATION

16 BY MR. NOLL:

17 Q. You mentioned that you did not see any  
18 differences geographically?

19 A. Correct.

20 Q. But the Lawrence Berkeley National Report  
21 specifically states that they did see geographic  
22 differences. They saw much greater declines in  
23 three of the six states included in that study  
24 in the 5 to 6 percent range.

1 Did you see that in the report?

2 A. I'm sorry, I want to make sure that I'm  
3 referring to that page in my report in which I  
4 review the findings of the Lawrence Berkeley  
5 National Labs so I don't misconstrue the  
6 statements of that study. One moment.

7 Q. I'll quote them. For homes within a half mile  
8 of a large-scale solar project compared to homes  
9 two to four miles away, Berkeley Lab found a  
10 reduction of home sale prices in Minnesota of  
11 4 percent; North Carolina, 5.8 percent; and New  
12 Jersey, 5.6 percent.

13 A. Yeah, we reviewed that Lawrence Berkeley  
14 National Labs study that you referenced, and  
15 that study, to summarize for the rest of the  
16 people who are not familiar with it, studied 1.8  
17 million residential transactions around solar  
18 facilities in the states of California,  
19 Connecticut, Massachusetts, Minnesota, North  
20 Carolina and New Jersey.

21 They found that the overwhelming majority  
22 of the transactions in three of the states,  
23 including California, Connecticut and  
24 Massachusetts, that there was no impact. There

1 were three states in which the study found that  
2 there was a small impact; however, the three  
3 states represented more than -- or excuse me,  
4 approximately 70 percent of the total data. And  
5 so the three states in which they did find a  
6 small decrease represented 30 percent of the  
7 overall data.

8 There are -- and I believe the results of  
9 the negative differential for those three states  
10 was 5 percent or less. And the absolute, I  
11 believe, differential is negative 1.5 percent  
12 across all the data. The authors of the study  
13 cautioned that they could not apply the results  
14 of that study to other states, and they did not  
15 include Illinois as one of the states in their  
16 study.

17 Also, one of the states in their analysis  
18 that they showed had a negative impact was in  
19 Minnesota, and we did a specific paired sales  
20 analysis. The hundred-megawatt North Star solar  
21 farm, in which we extensively studied that solar  
22 facility and found that, I think we had at least  
23 nine transactions that sold. And so it was a  
24 pretty comprehensive analysis of that North Star

1 solar farm in Minnesota. And found that there  
2 was no impact. In fact, one of the homes in  
3 that North Star -- adjacent to that North Star  
4 solar farm sold as one of the highest price per  
5 square foot for that particular split-level  
6 style.

7 So while we can't speak for the authors  
8 themselves, we feel that we have comprehensively  
9 looked at the specific states that Berkeley  
10 National Lab looked at and feel confident that  
11 our analysis is strong and -- yeah.

12 Q. So you're saying you don't agree with their  
13 findings?

14 A. I'm saying that there are limitations and  
15 weaknesses. There are -- we have looked at the  
16 data that Ladd Solar has included in their  
17 study, which ranges from, I believe, land sizes  
18 of 0.01 to, I believe, over a hundred acres,  
19 indicating that there's some flaws in their data  
20 analysis. They are including data that has not  
21 been verified. They have also included  
22 transactions of homes that have sizes of over, I  
23 believe, a hundred thousand square feet, likely  
24 apartment buildings. And if you're not being

1 thorough with the data that you're analyzing,  
2 you are skewing the results.

3 So I find that there are some limitations  
4 to the data that the Berkeley National Lab has  
5 covered.

6 Q. Why did you cite it then?

7 A. Because I need to review all the academic  
8 literature out there, whether or not it is in  
9 favor of my conclusions or not. I don't want to  
10 exclude anything just for the sake that the data  
11 doesn't align with my conclusions. I want to  
12 make sure that I fully understand what all the  
13 data and publications say.

14 Q. Also, the University of Rhode Island study  
15 specifically stated that properties within a  
16 tenth of a mile of solar farms suffer a  
17 7 percent decline in valuation.

18 Is that not in agreement with your  
19 finding?

20 A. That is -- we found that -- I'm sorry.

21 I have also reviewed the University of  
22 Rhode Island study. And I want to make sure  
23 that I have the wording clear, because I quote  
24 it.

1           It says that there was no negative impact  
2           to homes near solar arrays in rural locations.  
3           These results suggested the test area in rural  
4           areas is effectively zero and statistically  
5           insignificant, 0.1 percent, and that the  
6           negative externalities of solar arrays are only  
7           occurring in nonrural areas.

8           Further, the study tested to determine the  
9           size of the installation impacted values and  
10          found no evidence of differential property  
11          values impacted by the solar installation size.

12          So we found that that study states that  
13          there is effectively zero impact to homes in  
14          rural locations.

15 Q.       But they also say that within a tenth of a mile  
16       all homes suffer 7 percent as an average.

17 A.       I don't find that that is what the study is  
18       saying.

19 Q.       That's what I have off of their front page of  
20       their report.

21 A.       And I have read the report in its entirety.

22 Q.       For the two properties involved in Ladd Solar 2  
23       and 3, the properties that you show in your  
24       analysis, all of them seem to be at greater



1 distance and be screened, either vegetatively or  
2 by buildings.

3 What do you find for unscreened homes that  
4 are close to solar farms?

5 A. We have not shown -- or we have not seen any  
6 impact for homes that are close or that have no  
7 screening. We have looked at over 40 homes, and  
8 I can't necessarily say which homes that were  
9 included in this particular report that have no  
10 screening itself. I do believe that the Grand  
11 Ridge Solar Farm in Illinois had very, very  
12 minimal screening. It was a little bit further  
13 away, in terms of distance.

14 I do have an example of a solar facility,  
15 I believe it's in Pennsylvania, in which there  
16 were homes within a hundred feet of the solar  
17 panels with zero vegetative screening that had  
18 no impact.

19 So we -- a lot of solar farms do provide  
20 vegetative screening, but there are some home --  
21 or excuse me, some solar installations that  
22 don't provide vegetative screening. And even in  
23 those cases, we have not shown that there's been  
24 a negative impact.

1 Q. On the summary table in your report, the one  
2 home that's under a hundred feet you're showing  
3 a decline in value. All of the others are well  
4 within a hundred feet.

5 A. This is a sampling of 10 of our 40 studies. So  
6 it is not an exhaustive list of all the research  
7 that we have performed. This report is already  
8 over a hundred pages. And so if we were to  
9 include all of our research, this would be over  
10 a 400-page report.

11 Let me see. I think you're looking at the  
12 one that is in Jefferson County, that particular  
13 example?

14 Q. Well, I'm looking at the summary data table on  
15 Page 115.

16 A. Right.

17 Q. Which states the distances --

18 A. Yeah.

19 Q. -- average distances.

20 A. So the example of Page 115 of -- are you  
21 looking at the example for the Farm 3, Jefferson  
22 County solar? Is that what you're referencing?

23 Q. Yes.

24 A. Okay.

1 Q. That's the only one that's close to the  
2 distance that we're talking about for the two  
3 residences that are involved at this site.

4 A. We also have the example of the Solar Farm  
5 Number 9 in this particular grouping of  
6 research, the INPA Franklin solar farm, which  
7 has a distance of 120 feet from the panel and  
8 153 feet from the house that showed a 0.56  
9 positive differential between the test sales and  
10 the controlled sales.

11 So I understand what you're demonstrating  
12 here is that the one example that was close in  
13 this list showed a --

14 Q. The point I'm trying to make is, the screening  
15 and proximity make a big difference in the  
16 valuation.

17 A. We have not seen that that has an impact.  
18 Certainly there are a lot of solar farms that do  
19 offer vegetative screening, but we don't  
20 necessarily see the evidence that it is a  
21 requirement for there not to be any impact.

22 And like I said, this represents a sample  
23 of the research that we have performed and not  
24 an exhaustive list.

1 Q. And were you aware that Patricia McGarr of your  
2 firm, your national director, stated that  
3 vegetative screening is extremely important to  
4 property value for solar farms?

5 A. I'm not sure I know the place or time in which  
6 she said that.

7 Q. She was quoted in the Farm Journal.

8 A. I did work with Pat McGarr closely before she  
9 retired in January of this year. I do not  
10 recall that that was a definitive stance, that  
11 without vegetative screening there would be a  
12 negative impact. So I'm not familiar with that  
13 being a requirement for there not to be a  
14 negative impact on property values.

15 MR. NOLL: That's all my questions.

16 MR. WELBERS: Who else has questions?

17 Karen, go ahead.

18 MS. NERAD: Karen Nerad.

19 EXAMINATION

20 BY MS. NERAD:

21 Q. Okay. You said -- you're talking about  
22 Freeport and Michigan and everything, that it  
23 would cause no devalues to their properties.

24 My question is to this, I have contacted

1 two realtors that are very reputable, and they  
2 will not even come out to our farm and do  
3 anything. They said this is all new to them.  
4 They can't say if it's going to devalue it or  
5 anything. I have contacted Mike Crowley, an  
6 appraiser. Appraisers won't even come out to my  
7 farm.

8 So how can you say -- when you're talking  
9 different states, have you ever done one in  
10 Bureau County?

11 A. We have not done one in Bureau County. As I --  
12 excuse me if I get this incorrect, but I believe  
13 that there's only one solar farm in existence in  
14 Bureau County at the moment. And I believe that  
15 we have looked to identify if there's been any  
16 sales of homes that surround that facility and  
17 there have not been.

18 We have, I believe, studied four existing  
19 solar facilities in Illinois. And we work  
20 with -- we research and study only existing  
21 solar facilities, as opposed to proposed solar.  
22 Because we're looking at, you know, empirical  
23 data, the actual sale prices that occur with the  
24 actual influence itself, as opposed to the

1 hypothetical influence of the unknown.

2 So that's why we are looking at solar  
3 facilities that exist and transactions that have  
4 actually occurred.

5 Q. Okay. I have a report here from your  
6 CohnReznick on Streator, Illinois. May 13th of  
7 2016, a house listed for \$225,000; 7/1/2016, it  
8 went down to 215,000; 8/12 of 2016, it went down  
9 to 200,000; 9/3/2016, still at 200,000; finally  
10 sold 10/31/2016 for \$186,000.

11 So how can you say that there -- it's not  
12 going to devalue any property?

13 A. I believe I know the home that you're  
14 referencing.

15 Q. I have the address, if you need it.

16 A. Is it 2098 North 15th Road in Streator?

17 Q. Yes, it is.

18 A. And that's the home that's next to the Grand  
19 Ridge solar farm, correct?

20 Q. I don't know if it's next to it. I just know  
21 the address. It's in your report.

22 A. I just want to make sure that I can reference  
23 the correct property.

24 We have studied that home that sold. You

1 referenced it. It was listed --

2 Q. At 225,000, and by the time it was all said and  
3 done, 186,000.

4 A. Correct. So when appraisers are looking to  
5 appraise a property, they look at a couple of  
6 different things. Primarily we look at the sale  
7 price, what the property actually sold for.

8 A list price is -- and this is just a  
9 general concept, not necessarily relating to a  
10 solar facility. A list price could be the top,  
11 necessarily, of what the a property can sell  
12 for. Sometimes there is a bidding war and  
13 properties sell for above list price.

14 But generally speaking, a list price does  
15 not indicate value in and of itself. That can  
16 be whatever a homeowner wishes to sell their  
17 property for. So I just want to put that out  
18 there, that a list price in and of itself does  
19 not equate to value.

20 The data that we have on that particular  
21 home -- let me just make sure that I have got  
22 this correct -- is that home sold for \$186,000  
23 after, you're correct, it was listed at 225,000.  
24 It sold for \$186,000, which was \$79.90 a square

1 foot, and the controlled sales sold for a median  
2 of \$74.35 a square foot.

3 So the homes that were of similar size,  
4 build, age, were selling for approximately \$75 a  
5 square foot, indicating that the list price was  
6 likely overinflated and was not an indication of  
7 market value, and what it sold for was the true  
8 indication of market value.

9 Q. Okay. But if it was overvalued on price, it  
10 still took a hit though. I mean, that's quite a  
11 big hit. I mean, you're saying all the other  
12 stuff, the value of the house and everything  
13 else, it's still a hit on the house, right or  
14 wrong?

15 A. It's a -- it was probably an overinflated list  
16 price, just like any other home not next to a  
17 solar farm could be inflated by any number of  
18 reasons. If it's not appropriately priced, it's  
19 not going to sell for that list price. Just  
20 because a homeowner decides to list their  
21 property for a certain price does not mean that  
22 it's going to sell for that price.

23 A lot of agents work with sellers to  
24 appropriately price their properties and, you



1 know, they can't necessarily persuade a  
2 homeowner to correctly price their home for a  
3 market. So there are times, regardless the  
4 presence of a solar farm, in which a home may be  
5 priced higher than what the market can support,  
6 not necessarily an impact on the solar farm  
7 itself. It's just it is what it is.

8 But we're comparing actual sale prices to  
9 actual sale prices.

10 Q. Okay. So you being a realtor, how can you  
11 tell, if you came out to my farm, what the price  
12 of my farm would be if I was to sell it when I  
13 can't even get a realtor, two of them, to even  
14 come out and look at my farm? Because they said  
15 it's too new in the state of Illinois, they  
16 can't give us a price.

17 A. I'm not a realtor. I am an appraiser. So I  
18 don't list and sell properties.

19 Q. Okay. Sorry. I thought you were.

20 A. I am not familiar with all the local realtors,  
21 but solar has been in Illinois for over ten  
22 years. There are a lot of newer solar projects,  
23 but we have spoken to numerous agents and  
24 brokers who have sold solar successfully and

1 have demonstrated that there isn't an issue with  
2 listing or selling properties and that there has  
3 been a wide pool of buyers who are not concerned  
4 with the presence of a solar farm.

5 Q. Okay. So let me redirect that then. With you  
6 being an appraiser, how can you come out -- can  
7 you come out and appraise my farm? Because I  
8 can't even get appraisers. I have asked  
9 appraisers and they said the same, exact thing:  
10 It's too new.

11 These solar farms are too new. I can't  
12 even get anybody out there.

13 A. I am not familiar with the people that you have  
14 spoken with.

15 Q. They are all from Bureau County.

16 A. Okay. But we have had lots of properties that  
17 have sold being next to a solar facility and  
18 have not had any issue listing or selling those  
19 homes. So I am not sure necessarily about the  
20 people that you have spoken with.

21 Perhaps I can help connect you with some  
22 brokers or appraisers after the meeting.

23 Q. Okay. Do these homes benefit from the solar  
24 farms that you have -- that have been sold?

1 A. We have found that the homes are selling for  
2 the same price as if they were not to be next to  
3 a solar facility.

4 In general, we find that solar farms do  
5 bring in additional tax revenue, which comes to  
6 primarily the school districts, and that a lot  
7 of property owners are interested in well-funded  
8 school districts. We haven't necessarily seen  
9 that that has a quantifiable impact to property  
10 values, but we do find that the additional tax  
11 revenue is a positive for the local community,

12 MS. NERAD: I'm done.

13 MR. WELBERS: Sir, you had a question?

14 AUDIENCE MEMBER: She covered it pretty  
15 much. Same questions.

16 MR. WELBERS: Anybody next?

17 Sue Pratt.

18 EXAMINATION

19 BY MS. PRATT:

20 Q. I understand your comparisons are similar, but  
21 are they in the basic, same area?

22 A. Yeah.

23 Q. Because even local, you know, areas can vary  
24 greatly on what a house is worth or what they

1 sell it for?

2 A. Yeah, so we primarily concern ourselves with  
3 homes that are within the same school district.  
4 Generally speaking, that, you know, covers the  
5 same kind of local characteristics and buying  
6 patterns of people who are looking in one  
7 community, is they are looking for, you know,  
8 similar schools. And, you know, we are making  
9 sure that we are removed from the solar farm  
10 sufficiently but within that same general  
11 location that a buyer would be looking in if  
12 they weren't looking at a home next to a solar  
13 farm.

14 Q. And I have another question, and I don't mean  
15 this bad. I just want to find this out.

16 You mentioned how -- with the data that  
17 they had presented that it can be skewed. Would  
18 you agree that any data that somebody presents  
19 can be skewed?

20 A. I'm not sure if I feel like I can be definitive  
21 in that. I feel like I -- I understand what  
22 you're saying, that, you know, is my data  
23 skewed.

24 Q. I'm just saying, you know, would you agree that

1 just about any data can be skewed?

2 A. I don't necessarily think that that's true.

3 I -- we have studied this for over seven years,  
4 and we are looking at the data in all market  
5 life cycles, from, you know, postrecession to,  
6 you know, kind of stabilizing to current, you  
7 know, run up the market.

8 We are looking at, you know, all the data  
9 in Midwest, other locations. We are looking at  
10 things that are brand-new solar to more  
11 established solar. We are constantly  
12 interviewing and talking to County assessors and  
13 real estate agents. So we are not doing this  
14 as, like, a one-time thing.

15 Q. I understand that.

16 A. Where a lot of these academic studies are  
17 looking at this for, you know, approximately a  
18 year or two, we're continuing to look at the  
19 data to make sure that, you know, this is not a,  
20 you know, specific time and place that has no  
21 impact; that we are continuing to look at it as  
22 the, you know, potential, you know, time shifts,  
23 and people change their opinions.

24 MR. WELBERS: Connie Stetson.

1 MS. STETSON: Connie Stetson.

2 EXAMINATION

3 BY MS. STETSON:

4 Q. Do you live by a solar farm?

5 A. I personally do not, no.

6 Q. Do you know people that live by a solar farm,  
7 like a family member?

8 A. I don't have any family members that live next  
9 to solar farms.

10 Q. And if you had a child and you lived in a house  
11 that was surrounded by three sides, would you  
12 feel safe with that child running around the  
13 yard?

14 A. I would personally, yes.

15 Q. Even though curiosity kills the cat, kids climb  
16 fences, you would feel safe with a solar farm  
17 around a family?

18 A. If you're asking me personally if I would feel  
19 safe, yes, personally I would feel safe living  
20 next to a solar farm.

21 Q. With children?

22 A. I have an 11-year-old daughter. Yes, I would  
23 feel safe.

24 Q. Well, if you have boys, boys will be boys and

1 they will climb fences and they will be -- I'm  
2 just saying. This is not a safe thing. It's  
3 not a safe thing for three sides of a house,  
4 especially when you go from property line to  
5 property line.

6 MR. WELBERS: Anything further?

7 MS. STETSON: I'm done.

8 MR. WELBERS: Tim Pratt.

9 MR. PRATT: Tim Pratt.

10 EXAMINATION

11 BY MR. PRATT:

12 Q. Hi, Erin.

13 A. Hi.

14 Q. I have got a question for you. I just need to  
15 verify what you said, and maybe I just missed  
16 it.

17 How many homes have you said you studied  
18 for these reports?

19 A. We have studied over 40 solar installations, in  
20 terms of individual homes that have sold. We  
21 have identified, you know, every single property  
22 that surrounds it in which we have to determine  
23 if there's been any transactions.

24 Of those properties that have sold after

1 the completion of a solar farm, I believe we are  
2 running somewhere around 500 to a thousand  
3 transactions. I'm not necessarily confident in  
4 that number.

5 Q. That's fine.

6 I heard you say 40. I wasn't sure if that  
7 that was 40 homes or 40 solar farms?

8 A. 40 solar installations.

9 Q. You said you used a sample but not an  
10 exhaustive list of properties. Is there a way  
11 that you choose that sample? I mean, how do you  
12 choose?

13 A. What do you mean by sample?

14 Q. When you do your impact report.

15 A. So what our process has been is to identify an  
16 existing solar facility, of which there is no  
17 additional potential influence. You know, you  
18 don't want it to be also next to a landfill or  
19 next to an airport or next to a rail line, in  
20 which, you know, the landfill, airport or rail  
21 line could also have an impact on the property.

22 We have to have the solar farm be around  
23 long enough for there to be a sale of a  
24 property. So we want to make sure that we're



1 studying closed transactions, so there's actual,  
2 you know, closed data in which to study.

3 And then we are looking at, you know --  
4 this takes, you know, lots and lots of hours to  
5 do. We are looking at, you know, solar  
6 facilities that are similar in characteristic to  
7 the proposed development.

8 Where we aren't necessarily commissioned  
9 by GreenKey to look at solar facilities for this  
10 property, we have done this for, you know,  
11 seven, eight years at this point. So we have  
12 built up a database of home -- solar facilities  
13 that we have studied. And, you know, when we  
14 are trying to understand, you know, what our  
15 locational characteristics for this proposed  
16 Ladd Solar 2 and 3, we're drawing upon our  
17 existing studies that we have performed over the  
18 last eight years that cover the appropriate  
19 geographical and, you know, Midwest/suburban/  
20 rural.

21 We're looking at, you know, how close the  
22 homes are to the solar facility, and then also  
23 looking at particular examples of solar being on  
24 multiple sides. So we might have to go out of

1 state to find an example of that particular kind  
2 of setup.

3 Q. Okay. So you're saying that you're using data  
4 from the last few years of studies you have been  
5 doing around. And you said it takes lots of  
6 hours to do?

7 A. Yes.

8 Q. So in Ms. Nerad's case, you know, she's talking  
9 to a couple appraisers. You know, how would  
10 they be able to do that -- you know, would it  
11 take them hours and hours to come up with an  
12 appraisal, you know, comparing this property  
13 with a solar farm, as opposed to not?

14 A. I would imagine that if another appraiser was  
15 looking to potentially determine if there was  
16 any impact versus no impact, yes, it would take  
17 lots and lots and lots of hours to do that.

18 Q. Okay.

19 A. Yes, I would imagine that if they are trying to  
20 isolate that influence independently, it would  
21 take a lot of time.

22 Q. So if they were to start from scratch, let's  
23 say, and didn't have the seven or eight years of  
24 experience that you guys do, a month? Two

1 months? I mean, how long would -- do you have  
2 an idea how long that would take?

3 A. I'm not sure.

4 Q. It took a long -- because as you said, it takes  
5 lots and lots of hours to do.

6 In Illinois you said there is really only  
7 ten years of data right now because that's about  
8 the time that solar farms have been there. So  
9 you're only dealing with ten years of data with  
10 property values in Illinois proper?

11 A. Uh-huh.

12 Q. Can I ask, you know, I mean, I know if  
13 Mrs. Nerad had an appraiser come out, they are  
14 going to take hours and hours, she would have to  
15 pay for it. Who is paying for the property  
16 value studies that you're doing on your impact  
17 reports?

18 A. GreenKey has commissioned this report from us,  
19 but certainly they have not paid for, you know,  
20 the eight years of data. We are, you know, a  
21 company that needs to make money, but we are  
22 not -- you know, we don't benefit from the  
23 passage of this solar farm. We don't, you know,  
24 get any additional money if this is approved or

1 not. You know, we provide the research to  
2 GreenKey, and whether or not the project passes  
3 or not; that's it.

4 Q. Okay. Do you often find -- or have you ever  
5 found any properties that you put in these  
6 reports where it says there has been declines,  
7 you know, the adjoining properties to a solar  
8 farm will lose value, or do you always find a  
9 positive?

10 A. So I think that the gentleman earlier pointed  
11 out that one of the homes in our list of data  
12 had a negative 1 percent difference between the  
13 control and test sales. So yes, we do find  
14 that, you know, not everything is positive, that  
15 there are fluctuations, just like -- you know,  
16 people's buying decisions rely on a lot of  
17 factors, and, you know, you can't necessarily be  
18 so precise that, you know, there's going to be  
19 absolutely zero impact every single time.

20 What we're looking for is a consistent and  
21 negative impact. So we're -- that's why we're  
22 doing this multiple times, to see if -- you  
23 know, there is a negative impact, we should be  
24 able to see it more than one time.

1           So, you know, there are instances of homes  
2           that sell next to solar facilities in which the  
3           differential is slightly negative, but, you  
4           know, it's not a consistent trend that we have  
5           identified over all these 40 studies.

6 Q.    Okay. One more question. And I haven't looked  
7           at all your studies. This is from April 5th of  
8           2024; not that that matters.

9           But my question is, Illinois has a fairly  
10          new siting standard, and that siting standard  
11          means that from the property line to the solar  
12          arrays can only be 16.66 yards. How many  
13          appraised -- I mean, are you including  
14          16.66 yards from property lines in these  
15          appraisals?

16 A.    Is that the 150 feet?

17 Q.    No. That's 50 feet.

18 A.    50 feet.

19          I am not sure if I have, off the top of my  
20          head, an example of a home that sells -- and is  
21          that 50 feet from property line?

22 Q.    Property line?

23 A.    Okay. Property line.

24          I do believe that is a couple of examples

1 that we have included in our report in which  
2 they are 50 feet from property line, and we  
3 don't see a negative impact or I -- you know,  
4 that gentleman over there pointed out that one  
5 of the homes in this list was within 30 feet of  
6 property line and it had a negative 1 percent  
7 differential between the data sets.

8 But I also have examples here of the  
9 Sunfish Solar Farm, which was 50 feet from the  
10 property line, and that was a positive  
11 2.4 percent. And then I do believe that there  
12 may be other examples that are not included in  
13 this list of being within 50 feet.

14 So I can't necessarily say that I remember  
15 all those examples off the top of my head, but  
16 no, I don't believe that we have sufficient data  
17 to say that there is a negative impact for being  
18 16.6 yards or 50 feet from property lines.

19 MR. PRATT: Okay. That's all I have for  
20 you, Erin. Thank you very much.

21 MS. BOWEN: Thank you.

22 MR. WELBERS: Chris Noll.

23 EXAMINATION

24 BY MR. NOLL:

1 Q. You mentioned that your firm has no vested  
2 interest in these two farms beyond this report,  
3 but doesn't your firm have an entire line of  
4 business, advising and helping finance solar  
5 farms?

6 A. I believe you're referring to CohnReznick  
7 Capital, and that is an independent entity. It  
8 is not related to CohnReznick, LLP, which I  
9 represent.

10 And so no, there is no benefit for  
11 CohnReznick to have a solar get approved.

12 MR. NOLL: Thank you.

13 MR. WELBERS: Any other questions?

14 Yes, sir. State your name.

15 MR. DUNSETH: Jim Dunseth.

16 MR. WELBERS: Thanks, Jim.

17 EXAMINATION

18 BY MR. DUNSETH:

19 Q. Ma'am, what county are you in now?

20 A. I'm in Bureau County.

21 Q. Okay. What township is this proposal in?

22 A. I'm sorry, I am not sure.

23 Q. Hall Township, ma'am.

24 A. I'm sorry, I understand the question. I'm

1       sorry, I don't believe I know the township.

2   Q.   Okay.  So my point is, all of your data has  
3       been done all over everywhere except Bureau  
4       County, Hall Township.  So you can't stand up  
5       there and tell me that -- nobody can stand up  
6       there and tell me that they know that this is  
7       not going to devalue the property or evaluate  
8       the property, because you have never done a  
9       study here, and no has -- neither has anybody  
10      else, ma'am.

11  A.   There's only --

12  Q.   Thank you.

13  A.   There's only one existing solar facility in  
14      Bureau County, and I believe that it was  
15      constructed approximately 18 months ago.  I  
16      might be incorrect on that.  But I have looked  
17      as recently as one month ago to see if there's  
18      been any transactions of homes next to that  
19      solar facility here in Bureau County, and as of  
20      one month ago there have not been any sales.

21                So I would love to do a study here in  
22      Bureau County, but based off of our criteria,  
23      there hasn't been anything to study.

24  Q.   That's my point, ma'am.  You can't tell me



1           what's going to happen here, because nothing's  
2           been done here in Hall Township in Bureau  
3           County.

4                     End of comment. Thank you.

5                     MR. WELBERS: Brad Bastion.

6                     MR. BASTION: Brad Bastion.

7                                     EXAMINATION

8 BY MR. BASTION:

9 Q. I have a question. Now, you say facilities in  
10 Bureau County. Would that be the one that's  
11 along Route 29 just outside of DuPue?

12 A. Yes, correct.

13 Q. There are no homes there?

14 A. I have driven it, yes. And that's why there's  
15 nothing to study, because there's --

16 Q. There's nothing there.

17 A. Right.

18 Q. It's wasteland from the Mobil chemical plant.

19                     MR. BASTION: That's all. Thanks.

20                     MR. WELBERS: Other questions?

21                                     (No verbal response.)

22                     MR. WELBERS: Any questions from our  
23 Board?

24                     MS. SMITH: I have one.

## EXAMINATION

1  
2 BY MS. SMITH:

3 Q. In your study, do you have a time frame of when  
4 these sales were made after the completion of  
5 the solar project? How soon, and what time  
6 frame were they sold?

7 A. So generally speaking, we're looking at the  
8 month the solar project has been operational,  
9 and then I think after that month.

10 We don't look at any homes that have sold  
11 during the construction period. Generally  
12 speaking, you know, the construction noise could  
13 potentially have an impact. So we are looking  
14 at the date the solar facility is operational  
15 and then thereafter.

16 Q. So can you address that? I mean, do you --  
17 have you found any issues? How soon can you say  
18 that?

19 A. We have not seen anything different from a  
20 solar farm being in operation for one month  
21 versus five years. So no, in terms of how long  
22 a facility has been operational, we don't find  
23 that there is an impact --

24 MS. SMITH: Thank you.

1 A. -- for the time after it's been operational at  
2 all.

3 MR. WELBERS: Anything else?

4 MS. SMITH: That's all.

5 MR. QUEST: I have a question.

6 EXAMINATION

7 BY MR. QUEST:

8 Q. Has your company ever been hired by a party  
9 that's maybe opposed?

10 A. I'm not sure if we have been hired by a party  
11 that's been opposed to solar, no.

12 MR. WELBERS: Is that all the questions?

13 MR. PLUTA: I'll have a few redirects, if  
14 that's all right, if now is the time,

15 MR. WELBERS: Now is the time.

16 MR. PLUTA: I'm going to be quick.

17 EXAMINATION

18 BY MR. PLUTA:

19 Q. So we heard some questions that were kind of  
20 pointed at the infrastructure in Illinois to  
21 review -- to price houses that are around solar  
22 facilities and to assess the houses.

23 If you turn to Page 4 of your adjacent  
24 property value impact report --

1 A. I don't think I have that in front of me.  
2 Thank you.

3 Q. Sure.

4 So at Page 4 of your report, which is  
5 paragraphs of you discussing sort of a summary  
6 of all the data that you went through, you noted  
7 that you specifically interviewed a township  
8 assessor in Otter Creek Township, LaSalle  
9 County; is that correct?

10 A. Uh-huh, yes.

11 Q. You interviewed a Rockford Township assessor in  
12 Winnebago County, Illinois; is that correct?

13 A. Yes.

14 Q. You interviewed a Champaign Township assessor  
15 in Champaign County, Illinois; is that correct?

16 A. Yes.

17 Q. And you interviewed Cindy Watts, an assessor in  
18 Fayette County, Illinois; is that correct?

19 A. Yes.

20 Q. Okay. So there are a number of assessors in  
21 the state of Illinois that you were able to  
22 interview about properties that were adjacent to  
23 solar -- to already-built solar facilities in  
24 their townships; is that correct?

1 A. Yes.

2 Q. Okay. You mentioned that you reviewed I think  
3 between -- that CohnReznick specifically has  
4 reviewed somewhere between 500 to a thousand  
5 transactions, many of which are in Illinois; is  
6 that correct?

7 A. Yes.

8 Q. And if those houses were sold, it meant they  
9 were sold by a real estate agent presumably; is  
10 that correct?

11 A. Yes.

12 Q. So is it fair to say that there -- you know,  
13 while there are individual assessors or  
14 individual real estate agents that either don't  
15 have expertise in selling or assessing homes or  
16 that haven't personally done it, that people  
17 have been able to assess homes near solar farms  
18 and sell them; is that correct?

19 A. Correct, yes.

20 Q. All right. Thank you.

21 One other question that I had is -- and  
22 this is in the same packet. At Page 13, and it  
23 goes on to 14, there was a question earlier  
24 about the distance between solar facilities and

1 properties in Illinois.

2 A. Uh-huh, yes.

3 Q. And the question that you were asked was  
4 whether or not any were as close as 50 feet.

5 Is it fair to say that this table lists  
6 out the setback requirements in Illinois in this  
7 county?

8 A. The table in this is referring to the Bureau  
9 County Solar Ordinance and the setbacks proposed  
10 by Bureau County.

11 Q. Okay. And is it your understanding, based on  
12 the table, that 50-foot setback is from the  
13 property lines of surrounding nonparticipating  
14 property owners; is that correct?

15 A. Yes.

16 Q. Is it also your understanding that the distance  
17 between nonparticipating dwellings and the  
18 property is 150 feet?

19 A. Yes.

20 Q. Okay. And this is included in your property  
21 impact report because you wanted to make clear  
22 what you knew about the project; is that  
23 correct?

24 A. Correct. This addenda is specific to Ladd

1 Solar 2 and Ladd Solar 3 and the siting of these  
2 two projects and the Bureau County solar siting  
3 standards, and that is a supplemental addenda to  
4 the larger report of existing solar studied and  
5 this addenda with the siting standards for this  
6 project that we have researched specifically for  
7 this particular proposed project.

8 Q. Okay. So that wasn't new information to you?

9 A. No.

10 Q. Okay. And knowing that that's the boundary --  
11 the setback lines in Bureau County doesn't shift  
12 anything that's in your reports, correct?

13 A. It does not, no.

14 MR. PLUTA: Thank you very much.

15 MR. WELBERS: Ms. Bowen, you can sit down,  
16 but don't go too far away.

17 MS. STETSON: Can I ask --

18 MR. WELBERS: Go ahead.

19 EXAMINATION

20 BY MS. STETSON:

21 Q. Now, you do know that the county setbacks are  
22 set by the State, not the County? You are aware  
23 of that? The State set that; took the County  
24 completely out of it.

1 A. That is what was put in by the County, and so  
2 whether or not --

3 Q. That's because the State took the County away.  
4 I just want to make sure that it's not the  
5 County's ruling; it's the State's ruling.

6 A. All right.

7 MR. WELBERS: Okay. Tim.

8 MR. PRATT: Tim Pratt again.

9 EXAMINATION

10 BY MR. PRATT:

11 Q. I might have got confused. I have got that  
12 here on Page 13 and 14 of what I have, but tell  
13 me again, what are the setback requirements for  
14 the County, for the State of Illinois?

15 A. So for nonparticipating landowners, it is  
16 50 feet from the property line and then 150 feet  
17 from the dwelling to the solar project.

18 Q. Okay. Thank you.

19 And you talked about some of the  
20 assessment officers and how they're saying that  
21 they are not seeing devaluation of property.  
22 How many of those assessment officers own  
23 property that they are selling?

24 A. I would not know.



1 Q. I wouldn't know either, but it would be an  
2 interesting question to find out.

3 MR. PRATT: Thank you very much.

4 MR. WELBERS: Ms. Bastion.

5 MS. BASTION: Christine Bastion.

6 EXAMINATION

7 BY MS. BASTION:

8 Q. I have a question. All these homes that you  
9 say were increased with the solar farms and that  
10 and how many homes sold, do the towns get  
11 benefits from the solar companies?

12 A. So my general understanding of the way the  
13 solar farms operate is that solar farms are  
14 taxed, and that -- and those tax dollars go to a  
15 variety of pockets: school districts, fire  
16 departments. The same pockets that the  
17 underlying land goes to, the same percentages,  
18 you know, the millage rate.

19 It is just now that -- as opposed to being  
20 assessed as farmland, it is now assessed as an  
21 energy project. So the assessed value is much  
22 higher, and therefore the resulting tax dollars  
23 is much greater than if it were land. So now  
24 there's additional tax payments going to school

1 districts, et cetera, et cetera, and there are  
2 no additional users of those tax dollars. Like  
3 if you were to develop that into a subdivision,  
4 that might also increase the assessed values,  
5 but then you would have additional kids going to  
6 school, additional users on the roadways.

7 So in general speaking, the tax dollars  
8 generated from a solar project benefit the  
9 surrounding community.

10 Q. Okay. Where this proposed project is going to  
11 be at is not in Ladd. It's going to be  
12 connected to Ameren, and we won't get any --  
13 Ladd won't get any of that --

14 A. I'm not an economic expert. I don't know where  
15 the specific dollars for this particular project  
16 are going or not going. The -- my expertise is  
17 limited to understanding if adjacent properties  
18 are going to be impacted or not.

19 Q. I was just wondering, because right now it  
20 doesn't seem like it's going to benefit our  
21 community.

22 A. I think that might be a question for Reuben.

23 MS. BASTION: Okay.

24 MR. WELBERS: Mrs. Flaherty.

1 MS. FLAHERTY: Pam Flaherty.

2 EXAMINATION

3 BY MS. FLAHERTY:

4 Q. Going back to your Page 4, where you talk about  
5 all these county township assessors, how many  
6 homes were actually sold in those four or five  
7 counties referenced?

8 A. I don't know that data off the top of my head,  
9 but, you know, we spoke to all these assessors  
10 and have questioned if they have identified any  
11 trends in homes that have sold next to solar  
12 facilities. They have indicated that they have  
13 not identified any trends one way or the other.

14 We did not specifically ask the number of  
15 homes that they have tracked, and so I don't  
16 know if I can answer that question with a number  
17 for you.

18 Q. So it's fair to say there could have been no  
19 homes sold around solar farms because nobody was  
20 willing to buy them, so therefore there would be  
21 no difference in price?

22 A. I'm not sure if I would make that conclusion,  
23 no.

24 Q. But you don't have any numbers of homes that

1           were sold either. So how do we know that that's  
2           not a number that's being --

3   A.       We have -- we have spoken to county assessors.  
4           I believe that there are some cases where the  
5           assessor has provided no comment because, in  
6           that case, they would not have any data to rely  
7           upon.

8                        The people that we have spoken to here  
9           have said on the record that they have not found  
10          any evidence of impact to property values.

11   Q.       But, again, you don't have any idea how many  
12          homes sold. So how can we tell if it's been  
13          impacted or not?

14   A.       I would imagine that an assessor who states for  
15          the record that there's no impact to property  
16          values is not making things up.

17   Q.       Depends how the question was asked, too.

18                       MS. FLAHERTY: Thank you.

19                       MR. WELBERS: Are we good with our  
20          questions now?

21                                        (No verbal response.)

22                       MR. WELBERS: Okay. Sit down for just a  
23          few minutes.

24                       Now, again, this is Ladd Solar 3, and your

1 witness has just completed testimony and  
2 cross-examination. Is there any other evidence  
3 in Ladd Solar 3 that you care to introduce right  
4 now before we table and go to Ladd Solar 2?

5 MR. PLUTA: Sure, yeah, and I can explain  
6 what it is and you can tell me what you would  
7 like me to do.

8 So between the last hearing and this  
9 hearing, Mr. Grandon spoke with one of the  
10 neighboring property owners of Ladd Solar 3 and  
11 produced a landscaping plan for the area around  
12 that person's property. We're okay with making  
13 it a condition to the application.

14 So we have a copy of the plan. I don't  
15 know if we need to have evidence heard or  
16 testimony heard on it or if you just want to  
17 accept it, take it for what it's worth.

18 MR. WELBERS: So you have developed a  
19 plan. You have it in your hand. It's a piece  
20 of evidence you're going to submit to the Zoning  
21 Enforcement Officer. You're going to add it to  
22 the stipulations?

23 MR. PLUTA: Yes.

24 MR. WELBERS: Is there any testimony we

1 need, or do we just accept it as a stipulation  
2 when we get to stipulations?

3 MS. DONARSKI: Well, I think it would be  
4 good for them to put in the record of what this  
5 says rather than just say, Here's our paper.

6 Would you mind putting that so we have  
7 some --

8 MR. PLUTA: Of course.

9 MR. WELBERS: Call your witness, please.

10 MR. PLUTA: Reuben.

11 REUBEN GRANDON,  
12 being first duly sworn, testified as follows:

13 MS. NEMETH: State your name and address  
14 for the record, please.

15 MR. GRANDON: Yes, thank you. My name is  
16 Reuben Grandon, R-E-U-B-E-N, G-R-A-N-D-O-N,  
17 3519 Northeast 15th Avenue, Number 325, in  
18 Portland, Oregon, 97212.

19 Thank you, guys. So this landscape plan  
20 is something that we developed internally, based  
21 on conversations with the closest neighbor to  
22 Ladd Solar 3, Mr. Chris Noll.

23 So in this landscaping plan, I believe it  
24 captures to the best of my ability what Mr. Noll

1 and I spoke about. Mr. Noll did describe what  
2 he was looking for for a landscape plan, and I  
3 used that as my starting point.

4 So this has one page that talks about the  
5 species and the planting, and then one page that  
6 has an exhibit that shows a map of where that  
7 landscaping will be. It is directly across from  
8 Mr. Noll's house, across Illinois Route 89, and  
9 it will be a continuous line of evergreen  
10 species. It will be planted in between our  
11 perimeter fence and the property line of the  
12 subject property, which is owned by the  
13 Gillans', and it's shown here in a green line on  
14 Exhibit A for this landscape plan.

15 So I'll go ahead and hand this out.

16 That's all I have.

17 MR. WELBERS: Questions on the landscaping  
18 plan?

19 EXAMINATION

20 BY MS. DONARSKI:

21 Q. Reuben, did you give a copy of this to Mr. Noll  
22 as well?

23 A. Yes, it's been emailed to Mr. Noll.

24 Q. Okay. And have you made landscaping plans with

1 any other adjoining property owners with Ladd  
2 Solar 3?

3 A. No, not for Ladd Solar 3.

4 MS. DONARSKI: Okay. That's all the --  
5 but I want to come back to that when we get over  
6 to Ladd Solar 2, just letting you know.

7 MR. GRANDON: Okay. Thank you.

8 MR. WELBERS: Mr. Noll.

9 EXAMINATION

10 BY MR. NOLL:

11 Q. Reuben, I sent you an email that I have not yet  
12 reviewed that.

13 A. Yeah, I don't believe I characterized that you  
14 had reviewed it. I said this is what I prepared  
15 based on our conversation.

16 Q. Just so you know that.

17 A. But you did receive an email?

18 Q. Yes, I did.

19 MR. WELBERS: Tim.

20 EXAMINATION

21 BY MR. PRATT:

22 Q. If in the future GreenKey would have to sell  
23 this facility, is the stipulation in there that  
24 they are going to pass on, keep this to the next



1 owners?

2 A. And, Mr. Pratt, that's the very purpose of  
3 submitting this into the record and making it a  
4 condition.

5 Q. Just wanted to make sure. Thank you.

6 MR. NERAD: What was the question again?

7 MR. WELBERS: The question again,  
8 Mr. Nerad.

9 MR. NERAD: Tim Nerad.

10 What was the question again?

11 MR. PRATT: I asked, Tim, that if GreenKey  
12 were to sell the development in the future, if  
13 then the stipulation for vegetative screening,  
14 the upkeep of it, would then follow to the next  
15 owner? And he said in the affirmative, yes, it  
16 would.

17 MR. NERAD: Even if they go bankrupt?

18 MR. WELBERS: Any other questions?

19 (No verbal response.)

20 MR. WELBERS: Is there anything further  
21 that you intend to produce on Ladd Solar 3?

22 MR. PLUTA: No, that's it.

23 MR. WELBERS: Okay. Go ahead.

24 MS. NERAD: Karen Nerad.

## EXAMINATION

1  
2 BY MS. NERAD:

3 Q. He did ask, and I don't think anybody heard.  
4 He said, even if you go bankrupt? Does that  
5 still hold true that they have to take care of  
6 it, if GreenKey goes bankrupt?

7 A. Yeah, in the worst-case scenario that you're  
8 describing, that GreenKey Solar would go  
9 bankrupt, the purpose of submitting this plan  
10 and our attorney, Mr. Pluta, recommending it as  
11 a condition of approval, is that this plan will  
12 live with our Conditional Use Permit.

13 So, you know, if we are able to achieve  
14 the granting of a Conditional Use Permit, there  
15 are several specific criteria that Ms. Donarski  
16 will attach to that CUP, and we need to adhere  
17 to each of those conditions. So Mr. Pluta is  
18 suggesting that this would, in fact, be one of  
19 those conditions of approval. And therefore,  
20 whether it's GreenKey Solar or a different  
21 company, Ladd Solar 3, LLC, they would be  
22 beholden to this plan.

23 So it's a good faith effort to make sure  
24 that this is how it is, GreenKey Solar or

1           myself.

2           MR. WELBERS:   Yes, Sue.

3           MS. PRATT:    Sue Pratt.

4                           EXAMINATION

5 BY MS. PRATT:

6 Q.    So Mr. Noll has said that he hasn't had a  
7        chance to look at that yet, and yet it's going  
8        into the record and possibly part of the  
9        stipulation.  If this were to pass and he looks  
10       at your proposal and something needs to be  
11       tweaked or something doesn't agree with him, can  
12       that be changed and discussed further?

13 A.    I believe it could be.  We would be more than  
14       willing to further discuss that and tweak it,  
15       but this plan has been developed in cooperation  
16       with Mr. Noll.

17 Q.    Right, but he hasn't had a chance to look at it  
18       yet.  So that's why I'm asking.

19 A.    Yeah, yeah, if that were a concern, we would be  
20       willing to discuss that further.

21           MS. PRATT:   Thank you.

22           MR. WELBERS:   Are we good now?

23                           (No verbal response.)

24           MR. WELBERS:   You can sit down, Reuben.

1           Okay. So basically for Ladd Solar 3, you  
2           have no further witnesses?

3           MR. PLUTA: Yes. We rest.

4           MR. WELBERS: All right. I would like to  
5           make a motion that we table Ladd Solar 3 right  
6           now. Until when?

7           MS. DONARSKI: Well, we'll get to that  
8           here in just a second.

9           I have a number of dates that I have  
10          looked at, as if you -- you all know that I have  
11          been calling you about all of these dates. And  
12          I have spoken tonight with Reuben and his  
13          attorney, and I believe the date that we are  
14          looking at is September 26th.

15          Is that correct, Reuben and Attorney  
16          Pluta?

17          MR. PLUTA: The 26th was the date, yes.

18          MS. DONARSKI: Yes, September 26.

19          On that date -- no matter what date that  
20          we picked -- I had a half a dozen dates -- we  
21          always had one person missing. We didn't have  
22          any dates that we had all of you all here.

23          So on the 26th, I got in the affirmative  
24          of attending Mr. Welbers, Mr. Forristall,

1 Mrs. Smith and Mr. Jensen. So that would be  
2 September 26th at 7:00 p.m.

3 (A discussion was held off  
4 the record.)

5 MR. WELBERS: So September 26th. Is  
6 Callie good with September 26th?

7 COURT REPORTER: Yes.

8 MR. WELBERS: So we are tabling this until  
9 September 26th, 7:00 p.m., right here at the  
10 Bureau County Courthouse. This is Ladd Solar 3  
11 that we are tabling. Anything else that I need  
12 to say, or should I see if I have backup from  
13 them.

14 MS. DONARSKI: I think we have to make a  
15 motion and a second.

16 MR. WELBERS: I did make a motion.

17 MR. QUEST: Second.

18 MS. SMITH: I'll second that.

19 MR. WELBERS: I don't know who was first.

20 MS. NEMETH: Quest I think was.

21 MR. WELBERS: All in favor of tabling  
22 that.

23 (All those simultaneously  
24 responded.)

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MR. WELBERS: None opposed.

So we are -- we'll set that off to the side.

(The hearing was recessed at 8:30 p.m.)

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Now on this 16th day of September, A.D., 2024,  
I do signify that the foregoing testimony was given  
before the Bureau County Zoning Board of Appeals.

Barry Welbers, Chairman

Kristine Donarski,  
Zoning Enforcement Officer

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