From: Paulette Mann
Sent: Wednesday, January 16, 2019 11:36 AM
To: Patrick White
Subject: FW: GBenton@spotsylvania.va.us, cyakabouski@spotsylvania.va.us, kmarshall@spotsylvania.va.us,, McLaughlinTJ@spotsylvania.va.us, David.Ross@spotsylvania.va.us, PTrampe@spotsylvania.va.us, gskinner@spotsylvania.va.us, BOS@spotsylvania.va.us, wparrish@spotsy

---

From: mlaytes@verizon.net [mailto:mlaytes@verizon.net]
Sent: Monday, January 07, 2019 5:13 PM
To: berkeleymaddox@gmail.com; grenewpc@gmail.com; Paulette Mann; 2012sheriffsmith@gmail.com; spotsysalem@gmail.com; TravAAU@cox.net
Subject: GBenton@spotsylvania.va.us, cyakabouski@spotsylvania.va.us, kmarshall@spotsylvania.va.us,, McLaughlinTJ@spotsylvania.va.us, David.Ross@spotsylvania.va.us, PTrampe@spotsylvania.va.us, gskinner@spotsylvania.va.us, BOS@spotsylvania.va.us, wparrish@spotsylvan

To the members of the Spotsylvania Planning Commission -
First, I appreciate all the work you and staff have put into evaluating the proposed solar power plant.

Some have argued that the benefits of this project are more than offset by the fact it is so heavily subsidized through tax credits to both SPower and to those who would get credits for 'buying' solar power, and also by the potential significant negative impact on utility rates. I'll leave those broader questions to others to debate.

To me the core issue here is the impact the proposed six hundred million dollar project and its construction will have on the surrounding community, and on the county as a whole. The staff recommended SUP conditions are crucial to limiting these impacts. However, I do not think they go far enough in several key areas.

- **Setbacks.**
  - Setbacks should be from the property line, and to be fair to all property owners should be consistent across the entire project, and not different based on whether a house currently exists or not.
  - The staff recommended a 350' setback based on Dewberry's recommendations. However, those recommendations themselves scale down the setback from the 1,000'+ setback some analysis suggests. Given the visual, noise and potential heat impact I believe a setback of 500', reduced by half where the applicant will add an 8' berm and extensive landscaping, is the minimum necessary to mitigate the impact on surrounding properties.
  - To minimize the potential impact on the tax base setbacks should not be reduced to credit the acquisition of improved lots, either via purchase or lease.
- **Burning.** Open burning should be banned due to the environmental and health impacts. The applicant has the option of mulching the tree stumps and other materials left after the clear cutting that has already been done. The materials they choose not to mulch they should remove to either a landfill or to an incinerator with appropriate controls.
- **Traffic.** I fear for the impact on the two lane roads that will be used to move the materials and crews in and out of the project area. My biggest concern has to do with

potential delays to emergency and other first responder vehicles. The SUP should require that before construction begins that the applicant produce and have approved a traffic management plan that ensures that emergency and other first responder vehicles will not be delayed by traffic backups caused by its traffic. Put the onus directly on the applicant to prove it can build this project without creating a significant risk of delayed response. Absent such an approved plan the potential impact to life and safety is too great.

- **Solar panel recycling. T**he SUP should require that all solar panels used on the project be recycled offsite once broken or no longer used in operation.
- **Decommissioning.**
    - Since the project will use new solar panels their value will probably initially exceed the cost of removal. Thus it probably doesn't make sense to have the initial decommissioning bond include costs to recycle the panels.
    - However, since solar panel recycling is at a very early stage of development in terms of the scale that will be needed, it makes even less sense to project now what the net value of the panels might be in 30+ years.
    - A reasonable solution would be to initially have the decommissioning bond ignore the panels, and instead require that each bond resetting from year 4 on include the full cost of removing and recycling the panels, but with the then average recycling cost or credit for solar panels at that time in the U.S factored in if the applicant provides sufficient evidence of industry wide average net costs or credit. Such an approach doesn't require that the applicant post an overly large initial bond, but also ensures that in later years the bond will reflect real decommissioning costs, including the developing recycling market.
- **Bonds.** Significant performance bonds should be required to ensure compliance with each SUP condition. The SUP should require that performance bonds and the decommissioning bond be backed directly by SPower and its principal owners, not simply by the hodgepodge of LLCs created by SPower.

Thanks for your time and consideration. Even with the above conditions there will be very significant adverse impacts on the community. I can only hope SPower's project will be worth it. Without the above conditions the impacts would simply be too great to warrant approval.

Mike Aytes
11521 General Wadsworth Dr.
Spotsylvania, VA 22551
mlaytes@verizon.net

--
This email was Malware checked by UTM 9. http://www.sophos.com