

DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGY

1		
2		TABLE OF CONTENTS
3	I.	INTRODUCTION
4		Attachment A (Morgan Shook Resume)1
5	II.	PURPOSE AND SUBJECT MATTER OF TESTIMONY
6		Attachment B
7		Ben Hoen et al., A Spatial Hedonic Analysis of the Effects of US Wind Energy
8		Facilities on Surrounding Property Values, 51 Journal of Real Estate Finance And Economics 1, 22-51 (2015)
9		
10		Ben Hoen et al., Wind Energy Facilities and Residential Properties: The Effect of Proximity and View on Sales Prices, 33 Journal of Real Estate
11		Research 3, 279-316 (2011)
12		Ben Hoen et al., The Impact of Wind Power Projects on Residential Property Laboratory (2009)
13		
14		Steven Laposa & Andrew Mueller, Wind Farm Announcements and Rural Home Prices: Maxwell Ranch and Rural Northern Colorado, 2 Journal of Sustainable Real Estate 1, 383-402 (2010)
15		Vanuallana Coma & Coma I and Dunanta Valua Instructor of Communical
16 17		Vasundhara Gaur & Corey Lang, Property Value Impacts of Commercial- Scale Solar Energy in Massachusetts and Rhode Island, University of Rhode Island (2020); and
18		Leila Al-Hamoodah et al., An Exploration of Property-Value Impacts Near
19		Utility-Scale Solar Installations, University of Texas At Austin (2018)
20	III.	TESTIMONY ON PROPERTY VALUE IMPACTS5
21		Attachment C5
22		Corey Lang et al., The Windy City: Property Value Impacts of Wind Turbines in an
23		Urban Setting, 44 Energy Economics, 413-421 (2014)
24		Ben Hoen & Carol Atkinson-Palombo, Wind Turbines, Amenities and
25		Disamenitites: A study of Home Value Impacts in Densely Populated Massachusetts, 38 Journal Of Real Estate Research 4, 473-504 (2016))
26		

 $\mbox{Page}\,\mbox{i}-\mbox{ DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGY}$

SIOEL RIVES LLF 760 SW Ninth Avenue, Suite 3000, Portland, OR 97205 <i>Main 503.224.3380 Fax 503.220.2480</i>	1	Patrick Devine-Wright, Beyond Nimbyism: Towards an Integrated Framework for
	2	Understanding Public Perceptions of Wind Energy, 8 Wind Energy 2, 125-139 (2005)
	3	Maarten Wolsink, Attitudes and Expectancies About Wind Turbines and Wind
	4	Farms, 13 Wind Engineering 4, 196-206 (1989)
	5	Salma Elmallah, Ben Hoen, K. Sydny Fujita, Dana Robson, Eric Brunner,
	6	Shedding light on large-scale solar impacts: An analysis of property values and proximity to photovoltaics across six U.S. states, 175 Journal of Energy Policy
	7	(April 2023)
	8	
	9	
	10	
	11	
	12	
Suite 3	13	
Cenue, 3	14	
SIOEL R Ninth Avenue, Suit Main 503.224.3380	15	
SW Ni Ma	16	
760	17	
	18	
	19	
	20	
	21	
	22	
	23	
	24	
	25	
	26	

Page ii – DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGYMASTER CAPTION

1		JUNE 12, 2023
2	I.	INTRODUCTION:
3	Q.	Please state your name, occupation, and business address.
4	A.	My name is Morgan Shook, I am a Senior Policy Advisor and Project Director with
5		ECONorthwest, an economics, finance, and planning consultancy. I work out of our
6		Seattle office at 1200 Sixth Ave, Suite 615, Seattle, WA 98101.
7	Q.	What are your job duties and responsibilities in that role?
8	A.	I am a Project Director and member of the Board of ECONorthwest. As a Director, I
9		am responsible for marketing the firm's expertise and leading its research
10		engagements. In this capacity, I oversee the development of our work plans and the
11		quality assurance of their execution including taking on research and preparation of
12		work product. As a member of the Board and shareholder, I have a shared
13		responsibility for the firm's overall strategy and management. I have been employed
14		in such a capacity since February 2014. I have also served as a Commissioner for the
15		City of Seattle's Planning Commission.
16		I have led projects conducting economic analyses of real estate that include the use of
17		summary statistics, correlational analysis, regression analyses, and machine learning
18		techniques. These projects have been conducted on behalf of private, public, and non-
19		governmental organizations seeking to understand various questions regarding the
20		drivers of real estate investment and value.
21	Q.	What is your educational and professional background?
22	A.	A summary of my education and professional experience is included as Attachment
23		A. I graduated from the University of Puget Sound with a Bachelor of Science in
24		Biology and Portland State University with a Masters in Urban and Regional
25		Planning. In addition, I have a certificate degree in Commercial Real Estate
26		

Page 1 $-\;$ DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGY

2 teach a class on real estate research and analysis. 3 Q. How long have you worked as an economic analyst specializing in real estate 4 analyses? 5 A. I have over 25 years of experience as a researcher and 17 years working as a research 6 and policy consultant in my current occupation. My areas of expertise include land 7 use planning, market analysis, real estate development, housing and housing 8 affordability policy, and tax policy, public service deliver, and infrastructure 9 planning. I have direct experience with Growth Management Act (GMA) and State 10 Environmental Policy Act (SEPA). I have worked with municipal jurisdictions and 11 project applicants in the policy evaluation and entitlements of large residential, 12 commercial, and industrial projects. I have also helped housing developers evaluate 13 the appropriateness of impact fees on their projects. As a related matter, I have 14 conducted research examine the property and business level impacts of proposed 15 projects as part of the SEPA environmental review process. 16 Q. Have you previously analyzed the impact of facilities on surrounding property 17 values? Please explain and provide examples of such facilities. 18 A. Yes, I have previous experience with analyzing the impact of proposed large-scale 19 commercial, recreational, and industrial facilities on property values and impacts on 20 businesses. For example, as part of the SEPA environmental review process I have 21 assessed the property value impacts of a proposed regional jail facility for a coalition 22 on cities in King County, WA exploring the creation of a regional jail. I have also 23 evaluated the property value and business impacts of regional trail facilities including 24 the development of the "missing link" portion of the Burke Gilman Trail. I am also 25 currently evaluating the property and business impacts of the siting of King County 26 Solid Waste Transfer Station for the city of Woodinville, WA.

Development from the University of Washington Extension where I also currently

Page 2 – DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGYMASTER CAPTION

25

26

1 Q.

2 A.

3

4

	5	II.	PURPOSE AND SUBJECT MATTER OF TESTIMONY:
	6	Q.	For whom are you testifying and the purpose of your testimony.
JOSE NIVES LLF 760 SW Ninth Avenue, Suite 3000, Portland, OR 97205 Main 503.224.3380 Fax 503.220.2480	7	A.	My testimony is offered on behalf of Scout Clean Energy. The purpose of my
	8		testimony is to offer explanation and support for the Horse Heaven Wind Farm by
	9		providing analysis about the project's potential impacts on property values.
	10	Q.	Are you sponsoring any portions of the Application for Site Certification for the
	11		Horse Heaven Wind Farm (the "Application")? Please describe the portion of the
	12		Application you are sponsoring and your level of familiarity with that portion.
	13	A.	Yes, I am sponsoring aspects of Section 4.4 – Socioeconomic Impact, specifically, the
	14		discussions of property value impacts and information supporting that discussion.
	15	Q.	Is the information in these portions of the Application within your area of expertise?
	16	A.	Yes.
	17	Q.	Did you prepare these portions of the Application?
	18	A.	No, my understanding is those sections were prepared by Scout Clean Energy's
	19		consultant, Tetra Tech, with Scout project staff review.
	20	Q.	How are you familiar with these portions of the Application and supporting
	21		information?
	22	A.	I have reviewed the property impact analysis and supporting data and literature on
	23		which it is based, including (i) Ben Hoen et al., A Spatial Hedonic Analysis of the

When were you first engaged in this matter?

the Horse Heaven Wind Farm.

I was first engaged in this matter in spring 2023 when ECONorthwest began work

reviewing, supporting and supplementing Applicant's property impact analyses for

Page 3 – DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGYMASTER CAPTION

Effects of US Wind Energy Facilities on Surrounding Property Values, 51 Journal of

Real Estate Finance And Economics 1, 22-51 (2015); (ii) Ben Hoen et al., Wind

Energy Facilities and Residential Properties: The Effect of Proximity and View on

1		Sales Prices, 33 Journal of Real Estate Research 3, 279-316 (2011); (iii) Ben Hoen et
2		al., The Impact of Wind Power Projects on Residential Property Values in the United
3		States: A Multi-Site Hedonic Analysis, Lawrence Berkeley National Laboratory
4		(2009); (iv) Steven Laposa & Andrew Mueller, Wind Farm Announcements and
5		Rural Home Prices: Maxwell Ranch and Rural Northern Colorado, 2 Journal of
6		Sustainable Real Estate 1, 383-402 (2010); and (v) Vasundhara Gaur & Corey Lang,
7		Property Value Impacts of Commercial-Scale Solar Energy in Massachusetts and
8		Rhode Island, University of Rhode Island (2020); and (vi) Leila Al-Hamoodah et al.,
9		An Exploration of Property-Value Impacts Near Utility-Scale Solar Installations,
10		University of Texas At Austin (2018), provided as Attachment B to my testimony
11		today. I am familiar with the contents of these materials and find that they use
12		standard research approaches and statistical tools to address the question on how
13		these types of facilities impact property values.
14	Q.	Are these portions of the Application based upon supporting data or literature that
15		reasonably prudent persons in your field are accustomed to relying on in their
16		practice?
17	A.	Yes, these types of economic analysis are the best type of evidence available, and use
18		accepted statistical approaches to evaluating impacts.
19	Q.	To the best of your knowledge, are the contents of these portions of the Application
20		true?
21	A.	Yes, the portion of the application on the research on property values accurately
22		summarizes the research reviewed.
23	Q.	Do you incorporate the facts and contents of these portions of the Application as part
24		of your testimony?
25	A.	Yes, I have included the facts and contents of these portions of the Application as part
26		of my testimony.

Page 4 – DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGYMASTER CAPTION

1	Q.	Do you sponsor the admission into evidence of Section 4.4 of the Application?
2	A.	Yes, I sponsor the admission into evidence of Section 4.4 of the Application
3	Q.	Are you able to answer questions under cross-examination regarding the property
4		value impacts analysis discussed in the Application?
5	A.	Yes, I am able to answer questions under cross-examination regarding the property
6		value impacts analysis discussed in the Application.
7	Q.	Did you rely on any other data or resources in developing your testimony today?
8	A.	Yes, I also reviewed additional studies on (i) the impact of wind energy development
9		on nearby urban real estate (Corey Lang et al., The Windy City: Property Value
10		Impacts of Wind Turbines in an Urban Setting, 44 Energy Economics, 413-421
11		(2014); Ben Hoen & Carol Atkinson-Palombo, Wind Turbines, Amenities and
12		Disamenitites: A study of Home Value Impacts in Densely Populated Massachusetts,
13		38 Journal Of Real Estate Research 4, 473-504 (2016)); and (ii) public perception of
14		wind farms over time (Patrick Devine-Wright, Beyond Nimbyism: Towards an
15		Integrated Framework for Understanding Public Perceptions of Wind Energy, 8
16		Wind Energy 2, 125-139 (2005); Maarten Wolsink, Attitudes and Expectancies About
17		Wind Turbines and Wind Farms, 13 Wind Engineering 4, 196-206 (1989);
18		Salma Elmallah, Ben Hoen, K. Sydny Fujita, Dana Robson, Eric Brunner, Shedding
19		light on large-scale solar impacts: An analysis of property values and proximity to
20		photovoltaics across six U.S. states, 175 Journal of Energy Policy (April 2023),
21		provided as Exhibits Attachment C.
22	Q.	Are there any modifications or clarifications to be made to Section 4.4 of the
23		Application?
24	A.	No, other than the additional explanation and support provided in my testimony
25		today.
26	///	

Page 5 – DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGYMASTER CAPTION

4 A.

III. TESTIMONY ON PROPERTY VALUE IMPACTS:

Q. What are the best practices and methods for studying the impact of industrial facilities
 on nearby real estate values?

The best practices and statistical methods for studying the impact of facilities on

- 5 on neuroy rear estate variation
- 5 nearby real estate values has been well established in the economic literature. These
- 6 include the specification of regression models as well as difference-in-difference
- 7 models used to isolate the impact of the facility relative to other important factors that
- 8 differentiate prices from one location to another or from one type to another.
- 9 Q. Does the research from Lawrence Berkley National Laboratory on wind turbines
- referenced in the analysis of the Application align with the best practices mentioned
- 11 above?
- 12 A. Yes, this research uses state-of-the-practice techniques for estimating property value
- impacts while controlling for confounding value factors that existed prior to the wind
- facilities' announcements of construction.
- 15 Q. What are the key conclusions of said research from Lawrence Berkley National
- Laboratory with regard to the impact of wind energy development on nearby real
- 17 estate values?
- 18 A. Consistent with the summary included in the Application, this research found that
- there was no statistical evidence that homes sold for less in close proximity to the
- turbines. As the authors of many of these studies further discuss, while their analyses
- cannot dismiss the possibility that individual homes could have been negatively
- impacted, they find that if these impacts do exist, they are either too small or
- infrequent to result in any statistically measurable fashion.
- Q. What are the key conclusions of said research from Lawrence Berkley National
- Laboratory with regard to the impact of solar energy development on nearby real
- estate values?

Page 6 – DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGYMASTER CAPTION

1 A. The 2023 research by Lawrence Berkley National Laboratory on property value 2 impacts of solar facilities found statistical evidence that homes sold for less in close 3 proximity of large-scale solar projects. The authors define large-scale projects as 4 ground-mounted photovoltaic generation facilities with at least 1 MW of DC 5 generation capacity. They found an average 2.3% reduction in home prices within 6 0.25 mi of a large-scale solar project. The impacts on homes located 1 to 2 miles from 7 a project were small in magnitude and statistically insignificant, suggesting that the 8 impact of these facilities on home values fades relatively quickly with distance. 9 However, the researchers noted that there was a great deal of "heterogeneity" in their 10 findings, meaning the results varied by the state the facility was located in, the level 11 of immediate urbanicity, and predominant land use. In their paper, this variation is the 12 basis for future research. 13 Q. Do you agree with the general conclusions of the studies from Lawrence Berkley 14 National Laboratory mentioned above? Please explain why. 15 Yes, their conclusions are reasonable and supported by the evidence provided in their A. 16 studies. Bases on my professional and research experience examining property value 17 impacts of other similar facilities, the approach and research tools used by the authors 18 are sound and use state-of-the-practice techniques. Further, their findings fall in line 19 with a emerging consensus within the economic literature on this issue. 20 Q. Are there other studies with conclusions in conflict with the conclusions of the 21 Lawrence Berkley National Laboratory studies mentioned above? 22 A. I have not conducted an exhaustive and comprehensive literature review of research 23 examining the property value impacts related to sighting of wind turbines and am 24 relying on the information included in the Application. However, based on my 25 general knowledge of these types of disamenity research on home values, I am not

Page 7 – DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGYMASTER CAPTION

25

26

1 aware of any other studies with conclusions that conflict with the conclusions of the 2 Lawrence Berkeley National Laboratory studies mentioned above. 3 Q. Do you agree with the general conclusions of those other studies mentioned above? 4 Please explain why. 5 A. The summary of research studies provided in the Application all use state-of-the-6 practice techniques and their conclusions are reasonable based on the evidence 7 provided in those studies. 8 Q. Could you please summarize the overall property value impact analysis in the 9 Application for Site Certification, including the data and literature on which it is 10 based? 11 The Application reviews the economic literature on property value impacts for wind A. turbine and solar facilities. Generally the literature cited in the application finds that 12 13 there is no statistical evidence that wind turbines impact the property values of homes 14 sold either pre or post announcement or post construction of the facility. They also 15 note that absence of statistical evidence does not necessarily mean that there is no 16 impact however if there is impact it is likely minimal or within the variance of there 17 are statistical estimates. These studies use state of the practice techniques, namely 18 regression analyses that use large data sets of home sales so that the researchers can 19 study whether the siting of these wind turbine facilities impact home prices either pre-20 or post-construction while at the same time controlling for confounding variables of 21 home characteristics and distance to the wind turbine facilities. The Application uses 22 this information to suggest that the wind turbines will likely have similar effects on 23 property values on proximate properties in Benton County. With respect to the

Page 8 – DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGYMASTER CAPTION

combined project facilities, the Application does not anticipate impacts to non-

participating property values and this conclusion is reasonable with regards to the

wind turbine facility and likely also the solar facility. Early high-quality research on

1 the solar has shown that there are statistically observable negative impacts on 2 property values but that these impacts are strongest closest to the facility (within 0.5 3 miles) and are not statistically observable a mile and further away. The researchers 4 note that there is still a high degree of variation in their findings, so some caution is 5 warranted in extrapolating this to all settings. 6 Based on the Application, no non-participating residences fall within the 0.5 mile 7 radius of the proposed solar arrays where anticipated impacts might be observed, and 8 no non-participants would have foreground views of solar arrays. 9 Q. Do you agree with the overall analysis mentioned above? Please explain why. 10 A. The analysis in the Application draws upon the study of similar facilities on property 11 values to inform the likelihood of impacts in the Benton County context and is a 12 reasonable way to assess the likelihood of property value impacts. The studies cited 13 are credible sources information and the cumulative weight of their findings provides 14 an emerging scientific consensus on the impact of wind farms on property values as 15 well newer studies on solar facilities. These research studies cited in the Application 16 use state-of-the-practice techniques to evaluate property impacts in a number of 17 settings. The authors of these studies have been careful to check the specifications of 18 their models and be aware of the limitations of their research findings when 19 discussing the conclusions and significance of their work. The disclosure and 20 discussion of this empirical work to the Benton County context provides the best 21 available information and science on the issue of property value impacts. 22 23 24 25

Page 9 – DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGYMASTER CAPTION

	1	DATED: June 12, 2023.	STOEL RIVES LLP
	2		and Sie
	3		TIMOTHY L. MCMAHAN tim.mcmahan@stoel.com ARIEL STAVITSKY ariel.stavitsky@stoel.com EMILY K. SCHIMELPFENIG
	4		
	5		
	6		emily.schimelpfenig@stoel.com Telephone: (503) 294-9517 Of Attorneys for Applicant
	7		Of Attorneys for Applicant
5	8		
STOEL RIVES LLP 760 SW Ninth Avenue, Suite 3000, Portland, OR 97205 <i>Main</i> 503.224.3380	9		
VES LLP 8000, Portland, OR Fax 503.220.2480	10		
LLP Portla 503.22	11		
IVES 3000,	12		
3. Suite 3380	13		
STOEL RIVES LLP Avenue, Suite 3000, Portla 03.224.3380 Fax 503.22	14		
STOEL R Ninth Avenue, Suit Main 503.224.3380	15		
0 SW	16		
76	17		
	18		
	19		
	20		
	21		
	22		
	23		
	24		
	25		

Page 10 – DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGYMASTER CAPTION

Page 11 – DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGYMASTER CAPTION

25

Page 12 – DIRECT TESTIMONY AND ATTACHMENTS OF MORGAN SHOOK ON BEHALF OF SCOUT CLEAN ENERGYMASTER CAPTION