

1 BEFORE THE STATE OF WASHINGTON
2 ENERGY FACILITY SITING EVALUATION COUNCIL

3 In the Matter of the Application of:

4 Scout Clean Energy, LLC, for Horse
5 Heaven Wind Farm, LLC,
6 Applicant.

DOCKET NO. EF-210011
REPLY TESTIMONY AND
ATTACHMENTS OF ANDREW R. LINES
ON BEHALF OF SCOUT CLEAN
ENERGY, LLC

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11 **ON BEHALF OF**
12 **SCOUT CLEAN ENERGY, LLC**

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14 **EXH-1037_R**

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24 **JULY 12, 2023**
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STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000, Portland, OR 97205
Main 503.224.3380 Fax 503.220.2480

- 1 **Q.** Please state your name, occupation, and business address.
- 2 **A.** My name is Andrew R. Lines, MAI. I am a Member of the Appraisal Institute and a
3 Principal for CohnReznick Advisory’s Valuation Advisory Services practice. My
4 business address is 1 S. Wacker Drive, Suite 3550, Chicago Illinois 60606.
- 5 **Q.** Please describe your education and professional expertise.
- 6 **A.** A summary of my education and professional experience is included on pages 114-
7 115 of the CohnReznick Real Estate Adjacent Property Value Impact Report,
8 included as an attachment to my testimony.
- 9 **Q.** Please describe the purpose of your testimony.
- 10 **A.** My testimony is offered on behalf of Scout Clean Energy, to respond to the pre-filed
11 rebuttal testimony filed by Tri-Cities CARES, including EXH-5603, EXH-5610, and
12 EXH-5621. Specifically, my testimony provides additional explanation to rebut
13 contentions that the Horse Heaven Project (“Project”) may have property value
14 impacts in the surrounding area.
- 15 **Q.** Are you able to answer questions under cross examination regarding your testimony?
- 16 **A.** Yes.
- 17 **Q.** Please describe your work on the Project.
- 18 **A.** Applicant Scout Clean Energy engaged CohnReznick to provide a detailed, site-
19 specific analysis of the potential property value impacts from the Project. I, along
20 with my colleague, Erin Bowen, MAI, conducted that analysis, presented in the
21 attached Real Estate Adjacent Property Value Impact Consulting Report and Site
22 Specific Analysis Addendum Report.
- 23 **Q.** Can you please briefly describe the steps you took to complete that work?
- 24 **A.** In order to analyze the potential impact of the Project on property values, we
25 reviewed multiple academic studies, peer authored studies, and prior CohnReznick
26 studies that analyzed the impact of wind facilities on nearby property. These

1 academic studies include multiple regression analyses of thousands of sales
2 transactions, and opinion surveys, for both residential homes and farmland properties
3 in rural communities. Our own paired sales studies have encompassed 15 existing
4 wind facilities in five states across the country analyzing thousands of sales
5 transactions in a variety of settings. We also interviewed over 20 County and
6 Township assessors with at least one wind farm in their jurisdiction. In addition, we
7 analyzed site-specific considerations such as soil productivity and land development
8 trends.

9 **Q.** Can you please briefly summarize your reports' findings?

10 **A.** The conclusion of the report is that data indicates that the Horse Heaven Project will
11 not negatively impact adjacent property values. The transactional data analyzed for
12 properties immediately adjacent to wind facilities do not show a measurable and
13 consistent negative impact on adjacent property values, thus, no diminution of values
14 to surrounding property is anticipated by the proposed development.

15 Based upon examination, research, and analyses of existing wind energy uses,
16 the surrounding areas, and an extensive market database, we concluded that no
17 consistent and measurable negative impact had occurred to adjacent property that
18 could be attributed to proximity to the adjacent utility-scale wind energy use, with
19 regard to unit sale prices or other influential market indicators such as marketing
20 time. In addition, interviews with market participants (local real estate assessors and
21 brokers) were conducted to give additional insight as to how the market evaluates
22 farmland and single-family homes that are proximate to wind energy uses. These
23 interviews reaffirmed that there was no difference in price, marketing periods or
24 demand for property directly adjacent to existing wind energy uses when compared to
25 similar properties locationally removed from any wind energy use's influence. This

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1 conclusion has been confirmed by numerous county assessors who have also
2 investigated this use's potential impact.

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STOEL RIVES LLP


TIMOTHY L. MCMAHAN
tim.mcmahan@stoel.com
WILLA B. PERLMUTTER
willa.perlmutter@stoel.com
ARIEL STAVITSKY
ariel.stavitsky@stoel.com
EMILY K. SCHIMELPFENIG
emily.schimelpfenig@stoel.com
Telephone: (503) 294-9517

Attorneys for Applicant