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Cascade Zoning Board of Adjustment [via e-mail only at adachs@cascadecountymt.gov]
Cascade County Planning Division Staff, Public Works Department
c/o Alex Dachs
121 4th St. No. Suite 2H/I
Great Falls, MT 59401

RE: Resubmission Materials for Fox Solar, LLC Unclassified Use Permit Application

Zoning Board of Adjustment Members and Planning Division Staff,

Thank you for your consideration of the Unclassified Use Permit (UUP) Application submitted by Fox Solar, LLC (Fox Solar). We appreciate the time and attention that both the Board and Planning Division Staff have dedicated to the application process.

Fox Solar urges the Board to approve the UUP Application. A decision approving the UUP Application complies with the Cascade County Zoning Regulations and meets all applicable legal standards, which are analyzed in order for the convenience of the Board and Staff. The following materials are also included for the consideration of the Board and Staff. There are no new documents included with this resubmission other than the revised application:

- Tab 1. Cascade County UUP Application completed by Fox Solar
- Tab 2. Fox Solar Site Plan
- Tab 3. Stormwater Erosion and Sediment Control Plan
- Tab 4. Technical Memorandum
- Tab 5. Fox Solar Impact Study by Kirkland Appraisals, LLC dated June 28, 2016
- Tab 6. Moore Appraisals Inc. Letter regarding Fox Solar and Portage Solar Sites Impact on Surrounding Property Values dated June 23, 2016
- Tab 7. Real Property Consultants review of Kirkland Appraisals, LLCs Impact Study dated February 9, 2016 (with referenced study attached)
- Tab 8. Determination of No Hazard to Air Navigation dated May 5, 2016
- Tab 9. Decommissioning Memorandum (Engineer's Opinion of Costs)
- Tab 10. Photos of Proposed Site
- Tab 11. Green Meadow Solar Project 10 Year Tax Estimate
- Tab 12. Custom Soil Resource Report for Cascade County Area, Montana
- Tab 13. Soil Map for Cascade County Area, Montana
- Tab 14. Tax Revenues Summary Provided by Montana Department of Environmental Quality

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The UUP criteria are satisfied as follows:

- I. **Fox Solar has met the requirements that the proposed development will not materially endanger the public health or safety.**

The project will not materially endanger public health or safety as shown below.

Traffic conditions in the vicinity, including the effect of additional traffic on streets and street intersections, and sight lines at street intersections and approaches: The proposed solar farm will operate without employees on site, and the only vehicle trips generated will be quarterly maintenance inspections by technicians in a single vehicle. Fox Solar has presented studies and materials confirming the traffic will be minimal and relatively insignificant. Vehicle site visits will be required only 1 to 3 times per quarter. Tab 4 "Maintenance" & "Safety"¹, Tab 5. The project will not impede sight lines at intersections or approaches. The proposed location is set back from all intersections and approaches. Tabs 2 & 10. The applicant will work with the county to assure traffic safety during installation of the facility.

Provision of services and utilities, including sewer, water, electrical, telecommunications, garbage collections, and fire protection: No water, wastewater, telecommunications, or garbage collection is required for the site after construction. Electrical service and the need for fire protection is minimal when compared with other permitted uses, such as public buildings or educational facilities. Tab 4, "Safety." The site will be monitored remotely and checked regularly by licensed electricians to ensure it is operating safely.

Soil erosion, sedimentation, and stormwater run-off: Fox Solar has submitted materials providing the measures that will prevent soil erosion, sedimentation, and stormwater run-off. Tabs 3 & 4. These include minimizing disturbed vegetation and soils, employing sediment basins and drainage features, and performing erosion control measures. Tab 4, "Stormwater Erosion and Sediment Control" & "Soil Protection." A detailed erosion and sedimentation control plan is developed for every project. Tab 4, "Soil Protection." Local vegetation is planted across the site, which will also prevent any issues in this area. Tab 4 "Dust and Weed Control."

Protection of public, community, or private water supplies, including possible adverse effects on surface waters or groundwater: No water supplies will be affected by the project. As explained above, extensive measures will be taken to avoid soil erosion, sedimentation, and stormwater run-off. Tabs 3 & 4. The materials used in the project are not toxic. Tab 4, "No Toxicity." The Missouri River is approximately .8 miles away from the project and will not be affected. See <http://svc.mt.gov/msl/mtcadastral/>.

Fox Solar has satisfied all necessary requirements. No information in the record rebuts any of these required elements.

¹ Tab 5, the Technical Memorandum, was authored by Jeffrey Webber, Development Engineer at Cypress Creek Renewables. Mr. Webber has a Master of Science degree in Mechanical Engineering and a Bachelor of Science degree in Astrophysics. Mr. Webber has testified at previous hearings and is expected to testify at the upcoming hearing as well.

In addition to the required considerations above, Fox Solar has presented additional information regarding the safety of the facilities. They are built according to applicable codes and specifications by the utility and include a safety fence. For additional details, see Tab 4, "Safety." Soil is also protected. Tab 3 & 4, "Soil Protection." There are no electro-magnetic fields (EMFs) outside safe limits. Tab 4, "Electro-Magnetic (EMF)." Fox Solar has also submitted a decommissioning plan; however, this is not expected for more than 30 years. Tabs 4, "Decommissioning" & 9.

Fox Solar has also obtained a Determination of No Hazard to Air Navigation from the Federal Aviation Commission. See Tab 8.

II. Fox Solar has met the requirement to show the proposed development will not substantially impact the value of adjoining property.

Consideration: The relationship of the proposed use and the character of the development to surrounding uses and development, including possible conflicts between them and how these conflicts will be resolved.

This requirement is satisfied as shown by the impact studies and endorsements of these studies. The project is approximately 30 acres which includes two different array areas. Tab 2. The project's landowners own parcels on the north, south, and east of the property. Tab 2. I provided an impact study as Tab 6 by Richard C. Kirkland, Jr., MAI of Kirkland Appraisals, LLC. This study proves that the installation of a solar project does not have a substantial impact on adjoining property and is in harmony with agricultural and residential uses. Tab 5.

I have also attached a letter from Montana general certified appraiser Tim Moore, MAI of Moore Appraisals, Inc. in Helena, Montana, which states "that the proposed projects will not substantially impact the value of the adjoining property and, that given the lack of impact from noise, traffic, odor, etc., the proposed developments will be in harmony with the area in which they are located." Tab 6, pg. 3. The letter is based on a very similar study by Mr. Kirkland, which is included with Tab 7. We plan to submit an updated letter from Mr. Moore as soon as it is available.

Mr. Kirkland's studies have also been endorsed by William M. Miller, MAI of Real Property Consultants in Medford, OR. His letter is attached as Tab 7 for the Board's consideration with the referenced study.

The studies are directly on point and provide a solid basis for approval of the project. The studies considered property very similar to the property at issue here, including multi-acre parcels surrounded by agricultural and residential use (for example the Alamo II project in San Antonio, TX; AM Best Solar project in Goldsboro, NC; and the Mulberry solar project in Selmer, TN). For example Tab 5, pgs. 9, 12-23. These studies include the impact of solar facilities that are "clearly visible" by the adjoining properties. See Tab 5, pgs. 13, 22-23.

Similarly, the facility proposed by Fox Solar is surrounded by property zoned SR-1, which allows for residential use, general agricultural uses, and limited agricultural uses as permitted principal uses. Cascade County Zoning Regs. 7.1.2.1. The proposed Fox Solar project is similar to the solar facilities in the studies, and some cases is smaller in size. For example Tab 5, pg. 4.

The studies show that the solar farms have had "no impact on sale price for residential, agricultural, or vacant residential land that adjoins or abuts the existing solar farms included in [the] study." Tab 5, pg.

12. They demonstrate that homes in the studied areas are appreciating or selling with no impact on sellout rate or time required to sell. Tab 5, pgs. 12, 14, 23.

It is also important to note this type of study is not yet feasible within Montana, as we are unaware of any similar solar project here. However, Cascade County has operating wind farms, which should further inform the Board's conclusion that proposed solar facility will not have substantially impact adjoining property values. Wind farms are much more intrusive than solar farms and have a greater impact on viewshed, for example. However, a number of studies show "[r]egardless of model specification, we find no statistical evidence that home values near turbines were affected in the post-construction or post-announcement/pre-construction periods." *A Spatial Hedonic Analysis of the Effects of Wind Energy Facilities on Surrounding Property Values in the United States*, U.S. Department of Energy (Aug. 2013). These studies are available at <http://www.realtor.org/field-guides/field-guide-to-wind-farms-their-effect-on-property-values> and are incorporated by reference into the record for the Board's review.

No evidence in the record indicates that the proposed facility would reduce the value of adjoining properties. The desire to maintain current views, or the desire that the land be used for another purpose, is not evidence of a "substantial impact" on value. It is also important to note the view surrounding the proposed site is not unblemished. The viewshed also includes a railroad track, substation, and other visible construction. See <http://svc.mt.gov/msl/mtcadastral/>. However, in an effort to work with adjoining property owners, Fox Solar remains committed to communicating with them regarding appropriate screening.

The proposed project satisfies this requirement for UUP application approval. No information in the record rebuts these studies or endorsements.

III. Fox Solar has met the requirement to show the proposed development will be in harmony with the area in which it is located.

Consideration: The relationship of the proposed use and the character of the development to surrounding uses and development, including possible conflicts between them and how these conflicts will be resolved.

The same study by Mr. Kirkland, MAI and additional information presented by Fox Solar, and the facts regarding permissible and existing uses of the surrounding area demonstrate Fox Solar has satisfied this requirement. The study notes that agricultural and residential use are the most common uses of property surrounding solar facilities. Tab 5, pg. 1. It states "[t]he data [Kirkland Appraisals, LLC] collected and provide in [its] report supports the compatibility of solar farms with adjoining agricultural and residential uses." Tab 5, pg. 24. This is confirmed in the letter provided by Moore Appraisals, Inc. Tab 6, pg. 3.

The detailed analyses of the factors impacting harmony of use, also demonstrate Fox Solar's proposed project satisfies this requirement:

Hazardous material: There is no potential hazardous waste byproduct as art of normal operations and there are no pending environmental impacts associated with development and operation. Tab 5, pg. 27. The panels contain no toxic materials. Tab 4, "No Toxicity."

Odor: Solar farms do not produce any noticeable odor. Tab 5, pg. 27.

Noise: There is no audible sound from the facilities at appropriate setbacks, which are contemplated in the Fox Solar project. Tab 5, pg. 27; Tab 4, “Audibility.”

Traffic: Vehicle site visits will be minimal and are required only 3 times per quarter. Relative to other permitted principal uses, traffic will be insignificant. Tab 5, pg. 27; Tab 4, “Maintenance” & “Safety.”

Stigma: Solar facilities do not suffer from any specific stigma and are generally favored. Tab 5, pgs. 27-28.

Appearance: The visual impact of a solar facility is similar to a greenhouse, which is a permitted use under the Cascade County Zoning Regulations. Tab 5, pg. 28; Cascade County Zoning Regs. 7.1.2.1. The panels are shorter than a typical residential dwelling, which is also a permitted use in this area. Tab 7, pg. 28; Cascade County Zoning Regs. 7.1.2.1. The panels are treated with an anti-reflective coating, and produce an effect similar to a body of water. Tab 4, “Glare”. The Missouri River is present in photos of the site taken by Planning Staff. Tab 10. This body of water is already in the viewshed, and the proposed project will produce a similar effect.

It is also essential to note that under SR-1, property in the area may be used for public buildings, educational facilities, or public institutions. Cascade County Regs. 7.1.2.1. It may be put to general agricultural uses, including raising hogs, dairy and beef cattle, and goats, or producing livestock products for the production of income. Cascade County Zoning Regs. 7.1.2.1 & Section 2 “Agricultural Use.” The proposed facility will create far less construction, noise, traffic, odors, or hazardous materials than these permitted uses. It will be less visible and will mitigate any resulting disturbance to the viewshed.

In addition, the surrounding area already includes other uses of land, such as an electrical substation owned by NorthWestern Energy Corporation and a railroad. Fox Solar will connect to this substation as part of its operation. Accordingly, electrical facilities are already onsite, permitted by the County, and considered by adjoining land owners.

The proposed facility is in harmony with the surrounding area. It cannot be reasonably argued that the proposed facility does not meet this prong.

IV. Fox Solar meets the requirement to show the proposed development will be consistent with the Cascade County Growth Policy.

Considerations: a. Consistency with the Growth Policy objectives for the various planning areas. b. Consistency with the municipal and joint land use plans incorporated by the Growth Policy.

The proposed project is directly in line with the County’s Growth Policy. It provides local investment to produce renewable, emission-free clean energy. The project will sustain and strengthen the economic well-being of the community by bringing local investment, a diversified and increased tax base, construction jobs, and increased demand for local business to Cascade County. It will protect and maintain the character and historic relationship with natural resource development, maintain the agricultural economy, and preserve and enhances the rural, friendly and independent lifestyle of Cascade County.

GOAL 1: Sustain and strengthen the economic well-being of Cascade County's citizens

Objectives:

A. Stimulate the retention and expansion of existing businesses, new businesses, value-added businesses, wholesale and retail businesses, and industries including agriculture, mining, manufacturing/processing and forest products.

Generally, the construction of the proposed solar farm will create opportunities for temporary high paying construction related jobs, thereby stimulating the local economy. Local businesses will likely be utilized for supplies, lodging, meals, and other goods and services during the 6-12 week period during construction. The project creates possibilities for local landscape maintenance to be hired for long-term ongoing weed mitigation and vegetation maintenance. Increased solar technology installed in Cascade County and the development of the facility advance the market for solar jobs in Montana. The energy produced will help meet regional demands including those from employment centers and businesses in Cascade County.

B. Stabilize and diversify the county's tax base by encouraging the sustainable use of its natural resources.

The proposed solar farm will help stabilize and diversify Cascade County's tax base by providing increased long term additional revenue and by producing renewable emission-free energy from a sustainable resource: the sun. Once installed, the facility will be valued and taxed as commercial property and business equipment, which should increase the tax revenues to Cascade County for years to come. The Department of Revenue estimated a ten-year tax revenue of more than \$324,000 for a similar project to be installed in Lewis & Clark County, considering tax abatements. This estimate is attached as Tab 11. A similar estimate will provided to the County if the project moves forward and will depend on the specifics of the project. The proposed land is currently classified as nonqualified agricultural land, which returns substantially lower tax revenues. The natural resource values from retaining the soil quality will continue after the life cycle of the facility, and thus sustain those natural resource values. Tab 4, "Soil Protection."

C. Identify and pursue primary business development that complements existing business, which is compatible with communities, and utilizes available assets. Identify and pursue targeted business development opportunities to include, but not limited to, manufacturing/heavy industry, telecommunications, and youth/social services.

As stated above, the proposed solar farm will benefit the local economy by creating opportunities for local construction and maintenance jobs, and the generation of renewable energy that will be utilized locally to offset carbon emissions. It is compatible with (in harmony with) the community in which it is proposed, as shown in the materials submitted with the application. Tabs 4-6. The facility utilizes available land in a manner that will increase and diversify County tax revenues.

One of the concerns voiced from members of the public is the potential impact of the facility on property values. Please see the study and supporting letters regarding solar farm impact on property values and supporting letters in Tabs 5-6. As explained above, this information shows "the proposed projects will not substantially impact the value of the adjoining property and, that given the lack of impact from noise, traffic, odor, etc., the proposed developments will be in harmony with the area in which they are located." Tab 6, pg. 3.

In addition, a 2014 study of the impacts of wind generation facilities on property values has been compiled.² After evaluating 50,000 residential real estate transactions near wind generation facilities in 27 counties across nine states, the study's authors found, "no statistical evidence that home prices near wind turbines were affected in either post-construction or post-announcement/pre-construction periods." While wind generating facilities are different from solar farms, we feel wind facilities would have a higher impact on real estate prices than solar facilities due to turbine heights having greater visibility over long distances. Based in part on this study and on our experience across the US, we feel the solar facility is compatible with neighboring development in part because it will not have a negative impact on home sales or property values in the area.

D. Promote the development of cultural resources and tourism to broaden Cascade County's economic base.

The proposed solar farm is compatible with cultural or natural resources and will not be contrary or interfere with Cascade County's recreational and tourism economy. The renewable energy produced has environmental benefits, such as carbon offset and sustaining clean air, land, and water. These environmental benefits, as clean energy, promote the cultural and natural resource values, and thus help promote and further the tourism industry in Cascade County.

E. Foster and stimulate well-planned entrepreneurship among the county's citizenry.

Renewable energy production in the form of solar facilities locating on resource land is a new industry in Cascade County. Not only will the technology and development of the facilities create the opportunity for jobs, but the energy produced at this site will contribute to the regional economy without any pollution.

F. Promote a strong local business environment. Encourage and strengthen business support mechanisms such as chambers of commerce, development organizations and business roundtable organizations.

As discussed, renewable energy production in Cascade County will strengthen the local economy by helping to meet the energy demands of Cascade County, diversifying and increasing the County's tax base, and creating opportunities for local jobs. This in turn strengthens the business environment in Cascade County.

G. Improve local trade capture for Cascade County businesses. Promote local shopping as well as well-planned businesses and new businesses.

As mentioned, renewable emission-free energy production in Cascade County will help in efforts to capture local trade for businesses by helping to meet the energy demands of the community. The project creates the potential for local contractors to be part of the construction and maintenance of the facility. The contractors will likely spend money in the local economy, thereby increasing economic activity and supporting other jobs in Cascade County.

² *A Spatial Hedonic Analysis of the Effects of Wind Energy Facilities on Surrounding Property Values in the United States*, U.S. Department of Energy (Aug. 2013) , available at <http://www.realtor.org/field-guides/field-guide-to-wind-farms-their-effect-on-property-values>.

H. Network with and support other economic development efforts in the region and statewide, in recognition of Cascade County’s interdependence with other communities and to leverage available local resources.

This project furthers the Governor Bullock’s Energy Blueprint, which is a statewide economic development effort that includes a “goal . . . to double the current solar development in the state by 2025.” The plan is available at <https://governor.mt.gov/Newsroom/ArtMID/28487/ArticleID/4325>. The applicant is new to Cascade County, and is willing to network with and support other economic development efforts in the County recognizing community values and to assist in leveraging available local resources.

I. Encourage the growth of the agricultural economy.

The facility is compatible with agricultural uses in surrounding property. It is a safe, quiet, low-profile, environmentally friendly option, which will not impact the agricultural use of the surrounding property. See Tab 4-6. In comparison with other land uses that are allowed in this district, such as residences, a Solar site will not generate conflicts with nearby agricultural landowners because there will be no complaints regarding herbicide and pesticide use, no conflicts with cattle moving down county roads, no conflicts over irrigation or fencing, or other potential concerns. Noxious weed will be managed and the soils will be conserved for future agricultural production.

According to a Finding in Cascade County’s Growth Policy Update, Economic Condition 5, “... some farms have found they support their main agricultural endeavor farming and lease out portion of their ground to support wind energy.” In terms of wind energy, state research has shown there are several environmental benefits for the environment, including the removal of tons of carbon dioxide. Renewable clean energy from solar allows agricultural owner to better weather the bad years of farming, and enhancing the sustainability and longevity of the remaining agricultural use.

J. Stimulate the growth of the economy by encouraging the use of alternate methods of energy production, including wind energy.

This facility is exactly the type of project Cascade County’s Growth Policy seeks under this objective. The proposed solar farm will stimulate the growth of the economy by being an alternative method of producing renewable energy, as described above, by creating the possibility of local jobs, increasing local demand for services, increasing and diversifying the County’s tax base, and helping meet Cascade County’s growing energy needs. See Tabs 4, 11.

GOAL 2: Protect and maintain Cascade County’s rural character and the community’s historic relationship with the natural resource development.

Objectives:

A. Foster the continuance of agriculture and forestry in recognition of their economic contribution and the intrinsic natural beauty of grazing areas, farmlands and forests.

The solar project is completely compatible with farming and other agricultural uses in the area by not creating air or noise quality or glare issues. In effect, the land use is a non-traditional type of agriculture that harvests renewable energy from the sun without the use of herbicides, pesticides, irrigation water

or fertilizers. As explained in the application materials, the facility will include local vegetation, is not toxic, will protect soil and wildlife, and will prevent storm-water runoff. See Tab 3-4. The project is will not cause any change or increase in the cost of surrounding agriculture.

B. Preserve Cascade County’s scenic beauty and conserve its forests, rangelands and streams, with their abundant wildlife and good fisheries.

The site is located away from the Missouri River and Interstate 15. No forests, rangelands or streams will be affected by the proposed solar farm. As explained in the application materials, the facility will include local vegetation, is not toxic, will protect soil and wildlife, and will prevent storm-water runoff. See Tab 3-4.

C. Preserve Cascade County’s open space setting by encouraging new development to locate near existing towns and rural settlements and by discouraging poorly designed, land subdivisions and commercial development.

The proposed solar facility is located in an existing rural settlement less than one mile from urban development. The project is well designed by licensed engineers and landscape architects and experts. This project does not represent urban sprawl and will not have any of the typical impacts of poorly designed subdivisions or commercial developments. It is compatible with surrounding land uses, as demonstrated in the application materials. See Tab 4-6.

D. Assure clean air, clean water, a healthful environment and good community appearance.

The solar project is completely compatible with farming and other uses in the area by not creating air, water, land, or noise quality or glare issues. The facility will include local vegetation, is not toxic, will protect soil and wildlife, and will prevent storm-water runoff. See Tab 3-4.

E. Support the development of natural resources including but not limited to timber, mining, oil and gas production, and renewable energy production.

Again, this facility is precisely the type of project the Cascade County Growth Policy seeks under this objective. The proposed use is to produce renewable energy from natural resources with the use of photovoltaic solar panels.

F. Continue to work with federal and state agencies to redevelop properties within Cascade County which are currently undergoing Superfund and Brownfields process.

The subject property is not a Superfund or Brownfields site. Due to the lack of toxins, fuels or other contaminants, the project will not create a new Superfund or Brownsfield site.

GOAL 3: Maintain agricultural economy.

Objectives:

A. Protect the most productive soil types.

The proposed solar farm will protect productive soil types. The application materials provide detailed information regarding the methodology Fox Solar will utilize to ensure soil compaction is mitigated, and stormwater erosion and sediment are controlled. See Tabs 3-4.

In addition, no prime farmland soils being impacted by the proposed solar farm. Attached as Tab 12 is the NRCS Custom Soil Resource Report for Cascade County Area, Montana and as Tab 13 the corresponding Fox Area Soil Map. The two predominate soil types making up the proposed solar area is 68% Marias silty clay (141), which is rates as “not prime farmland.” Another 26.7% of the proposed solar area is Kobar silty clay (115), which is “prime farmland if irrigated.” The subject property is not being irrigated at this time. As explained in the application materials, the soil will protected and available for use, if and when the project is no longer in use. Therefore, the most productive soil types are preserved for future use.

B. Continue to protect soils against erosion.

Fox Solar submitted an erosion, sediment, and soil compaction plan that demonstrates the methods employed to manage soils onsite. Tabs 3-4. Solar farms are low impact and the site will be reseeded to restore all temporary disturbance after construction.

C. Protect the floodplain from non-agricultural development.

The proposed solar farm is not within the floodplain.

D. Support the development of value-added agricultural industry in Cascade County utilizing the products from the regional area.

Local products, where available, will be utilized. Again, the solar project is completely compatible with farming and other uses in the area by not creating air, water, land, or noise quality or glare issues. The facility will include local vegetation, is not toxic, will protect soil and wildlife, and will prevent storm-water runoff. Tabs 3-4.

GOAL 4: Retain the presence of the US Military in Cascade County.

Objectives:

- A. Encourage the federal congressional delegation to actively support maintaining the current mission status at a minimum.**
- B. Promote the location of additional military missions in Cascade County.**
- C. Encourage the reactivation of the runway at Malmstrom Air Force Base for fixed wing operations.**
- D. Refer to the Joint Land Use Study for resolving conflicts and promoting mission compatible development.**

Goal 4 and its Objectives A through D relating to US Military facilities in the county are not directly applicable to the proposed solar farm. The proposed solar farm is completely compatible with these objectives. It has been reviewed by the F.A.A. and no concerns have been identified. See Determinations of No Hazard to Air Navigation. Tab 8

GOAL 5: Preserve and enhance the rural, friendly and independent lifestyle currently enjoyed by Cascade County's citizens.

Objectives:

A. Maintain Cascade County's citizens independent lifestyle and minimize local governmental intervention, to the extent possible, consistent with the requirements of a continually evolving economy and constantly changing population.

The introduction of solar facilities does not impede the independence of Cascade County residents and does not require local government regulation or intervention. It also fits within evolving industry in Cascade County and reflects the independent lifestyle of a changing community. The facility is new to Cascade County, will increase and diversify County tax revenues for years to come, and provides power for Cascade County's changing population.

B. Preserve and promote Cascade County's rich cultural heritage, rooted in natural resource development and reflected in its numerous cultural/historic sites and archaeological areas.

The proposed solar facility is exactly what the County's Growth Policy seeks under this objective. The solar facility develops the County's natural resources, which the objective states is the root of the County's rich cultural heritage. The facility will accomplish exactly what this Policy intends.

C. Promote fire prevention measures throughout the county, giving special emphasis to the extreme fire hazards present at the wild land/urban interface.

The proposed solar farm is designed with fire prevention in mind. It is built to comply with the National Electric Code. Inverters will be provided with exterior shut off switches that will not require the use of ladders or stairs for access. The Great Falls Fire Department's fire station is located less than 3 miles from the project. All vegetation on site will be consistently maintained and weeds will be controlled and eliminated. Panels will be constructed and installed in standards practice. The proposed use will not significantly increase fire hazards or significantly increase fire suppression cost or significantly increase risks to fire suppression personnel.

D. Encourage the continued development of educational programs and facilities, recreational opportunities and spaces and health services for all county residents.

Opportunities to educate and inform the local community on renewable energy production through the use of solar will be available during the review and development of the project. The applicant has explored the opportunities to partner with the local school district. April Senger a High School Science teacher in Great Falls has relayed all of her experience and progress with solar and education for her students. She has also offered several educational opportunities for the applicant to explore.

In addition, the facility will significantly enhance the tax base while requiring few public services. For example, the facility will not result in significant impacts to county roads or students requiring public educational services. Attached as Tab 14 is a spreadsheet showing tax revenues to local and state governments from wind energy sites in Montana. While wind harvesting is different from solar harvesting in terms of the taxable values, this spreadsheets provides a basis for evaluating potential tax revenues.

Sincerely,

A handwritten signature in cursive script that reads "Amy Berg Pickett".

Amy Berg Pickett
Cypress Creek Renewables

Attachments (Tabs 1-14)