



CENTER FOR PUBLIC ENVIRONMENTAL OVERSIGHT

A project of the Pacific Studies Center

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August 29, 2012

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By e-mail at cleanenergy@epa.gov

Dear Ms. Jones:

The Center for Public Environmental Oversight (CPEO) appreciates the opportunity to comment on the Draft *Best Practices for Siting Solar Photovoltaics on Municipal Solid Waste Landfills*. We support EPA's RePowering America's Land initiative, and indeed we have conducted case studies of siting solar power on municipal landfills to understand better how federal policies to encourage "brightfields" play out at the state and local level. We have looked closely at how community residents have participated in these discussions, the varied concerns they bring to the table, and the reasons they might support or oppose a solar Municipal Solid Waste (MSW) project.¹ We believe the *Best Practices* document would benefit from an added emphasis on community engagement.

We have found that community groups not only want to take part in discussions about solar power on MSW landfills, but in some cases they want to partner in solar power projects to bring the benefits of green energy to their neighborhoods, to show children how solar energy works, and to demonstrate the feasibility of the technology to local residents.² Community participation in photovoltaic (PV) feasibility studies has helped municipalities develop more thorough requests for proposals (RFPs) that resulted in detailed, high quality submissions from solar companies and easier approval.

¹ See CPEO case study of Hartford, CT: <http://www.cpeo.org/pubs/HartfordSolar.pdf>

² See CPEO case study of Amherst, MA: <http://www.cpeo.org/pubs/AmherstSolar.pdf>

In the absence of effective engagement, we have also found that community opposition to siting renewable energy can emerge for many reasons: the effect visual intrusion to the landscape may have on property values; changes to recreational opportunities or to a sense of place; the distribution of costs and benefits; local attitudes about the intentions of solar developers; and the character and quality of the planning or decision-making process. These non-technical issues can complicate or even derail worthy solar projects.

The stated purpose of the report is to address “common technical challenges for siting PV on MSW landfills” (p. 2), and its audience is primarily “solar developers, landfill owners, and federal, state and local governments” (p. 2). While the report considers community attitudes toward solar arrays in a few instances, such as visual impacts (p. 21) and potential mitigation strategies to reduce glare (p. 33), for the most part the report pays little attention to community perceptions, preferences, or opposition. In this regard, we feel the report sidesteps an opportunity to help improve the dynamics of the typical siting process on a MSW landfill. As we have seen in our site visits, community attitudes are formed for the most part in response to perceived risks, the long term economic viability of the project, and its distributional impacts, rather than the specific renewable energy technology.

The report contains much useful information on the design, construction, and operation and maintenance of solar projects on MSW landfills. The report is rather densely written, with few visual aids such as flow charts of the siting process or influence diagrams showing the roles and functions of various stakeholders. Nor is it structured in a way that would make it very useful for many community groups. The document should be presented in a way that community members are encouraged to read it, so they will be on the same page as agencies and companies. One way of thinking about information needs might be to consider what community residents want to know first. This is one of the lessons from our own case studies, as well as risk communication and public participation research.

A concluding chapter, “Engaging Communities and Addressing their Concerns,” would give agencies and companies a roadmap for working with communities. The chapter should be devoted to addressing the following questions of primary interest to communities.

- 1) How can the landfill be safely closed, with adequate monitoring and contingency plans?
- 2) How can power generation systems be designed and constructed to prevent the release of contamination?
- 3) How will the project make a difference, whether it’s improving a town’s economic viability, reducing the cost of electricity, mitigating climate change, or promoting energy independence?
- 4) Will the project make economic sense over the long term if federal and state incentives are cut?
- 5) What are the distributions of costs and benefits?
- 6) How can projects be designed to win community support?

This chapter should point out opportunities for broader benefits for solar projects. In Brockton, for example, community residents and the city required the solar company to create an educational module on site to explain solar power to the city's schoolchildren.³ In addition, the report could explain how developing solar on landfills could increase the effectiveness of site monitoring and the long-term management of such property. For example, PV array inspectors could be trained to identify conditions that could damage the final cap cover before the problems became more serious and expensive to repair. This responsibility could be written into an agreement with the solar company or a third-party responsible for the upkeep of the PV array as well as for security and other management issues.

Communities should not be seen as obstacles to solar power on landfills. Just as with remediation, projects are likely to end up better and have an easier time winning approval if communities are engaged from the start.

Sincerely,



Lenny Siegel
Executive Director



Robert Hersh
Research Associate

³ See CPEO case study of Brockton, MA: <http://www.cpeo.org/pubs/Brockton.pdf>