

This bill represents a significant undermining of Oregon's Land Use Laws as it provides for minimal justification for the development of Solar power facilities on Oregon's high value farm lands. This exception will result in a much more significant impact than the current exceptions allowing construction on high value farm land listed due to the number of developments which would take advantage of the change. Oregon has ample non-high value farm and forest lands which should be used for these types of commercial uses.

Section 2(3)(b) and the entire Section 3 should be removed from this bill. This language provides the opportunity to literally fill the state with solar developments and related transmission lines. The factors listed to justify ignoring Oregon Land Use laws are multiple, subject to liberal interpretation, and do not establish criteria such as the area that must be included in the evaluation of the need for a development to be constructed on high value farm lands. It appears to me that you have received at least one public comment that supports the bill believing that it will make it harder to site on high value farm land. If the developer were truly required to show that there were no other sites available in the state for their development, as they should have to, there would be no solar developments on high value farm land. As it is, they can prove the need to utilize high value farm land by meeting one of several very broad reasons.

Oregon is already at risk of having large tracts of our farm land filled with solar and wind developments for several reasons including:

1. Oregon provides no requirement that developers show a need for the energy that will be developed.
2. Oregon taxpayers are forced to support generous tax credits and financial incentives for solar developments which will not benefit Oregon electric users.
3. Energy developers are pushing the development of high voltage transmission lines like Boardman to Hemingway so that energy produced in Oregon can be marketed to other states.
4. The Idaho Public Utility Commission (PUC) now only requires 2 year contracts for solar energy producers. Oregon PUC requires 20 year contracts. Because of this, multiple solar developers now want to build solar developments in Oregon to produce energy for wholesale distribution to other states.
5. The impact of this law extends significantly beyond the actual solar development due to transmission lines required to move the energy to the grid.

This bill appears to be addressing a problem that does not exist. Oregon is not in need of additional renewable energy resources which would be built as a result of this bill as evidenced by the following:

1. At the March meeting of the Integrated Resource Plan Advisory Council to Idaho Power, the representatives of Idaho Power stated they would not be needing additional energy resources until the mid 2020's. The draft material indicates power purchase agreements for small amounts of additional energy are predicted starting 2025. The Oregon Utilities are predicting an even longer time before needing additional energy resources and they report that demand has been virtually flat for multiple years.

2. Oregon does not need additional renewable energy. We currently have operating 2015 Mw of wind developments which were sited by the Oregon Department of Energy and Energy Facility Siting Council. There are an additional 6 wind developments (Wheatridge, Golden Hills, Montegue, Perennial Wind Chaser, Saddle Butte and Summit Ridge) totaling 2312 Mw of additional wind which have been approved but not yet built due to a lack of customers. This does not include the wind and solar developments which have been approved by the counties and are either operating or are planned to be constructed. This is in an environment where Oregon already produces more energy than we use.
3. Umatilla Electric is planning to construct 300 acres of wind developments according to information they shared with the Umatilla County Commissioners. Adding the environmental costs of the related transmission lines and roads will significantly increase the damages of these developments
4. If the intent of this undermining of Oregon's Land Use Goals in order to meet the needs of other states by sacrificing Oregon resources, and requiring Oregon taxpayers to subsidize developments that are not intended to meet needs in Oregon, it is time to take a careful look at what this state can afford to sacrifice.

We are already losing our high value farm land due to impacts such as extending Urban Growth Boundaries. For example, during 2014/2015, there were 15 urban growth boundary amendments that brought 5,216 acres into urban growth boundaries. 3,341 acres were zoned EFU. From 1988 till 2015, we lost 62,298 acres of farm land according to the 2014-2015 Oregon Farm and Forest Report. The Agricultural Census reports that between 2007 and 2012, Oregon lost 98,069 acres of farm land.

This bill is not consistent with the protection of Oregon's farm land, and once it is lost to development, it does not return to agricultural uses. Decisions regarding the appropriateness of allowing solar developments on high value farm lands should remain a county process handled as an exception to Oregon's statewide planning goals. The current process is working. Solar developments are being sited, The siting process should continue to address multiple direct and indirect impacts

Thank you very much for considering these comments.

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