

May 18,2017

Subject: Amendment #4 to HB 3456 hearing on May 18th,2017,and OREC,UEC submitted Comments.

The following are additional comments by Blue Mountain Alliance to the above referenced input from OREC and UEC.

It is easy to be sympathetic to UEC's situation in trying to manage costs in their attempts to meet the Renewable Portfolio Standard(RPS) mandates in delivering cost effective energy to their members. Quite simply RPS mandates raise costs to all energy providers, i.e. all energy users pay more to meet the mandates of RPS.

However, we should exercise caution as to the solution to this issue. It would be easy to get rid of the existing process, Goal 3 exception, to solve the UEC and other energy users need to satisfy the RPS mandate issue. This would be a mistake and would have long term effects on our High Value Farm Lands. This is exactly what HB3456 would accomplish.

Approximately 2/3rds of Umatilla county is designated EFU-AVA High Value Farm land. Some have water rights some do not. Some had no Water Rights when originally designated, but due to economic factors acquired water rights later. Part of the designated lands are presently for dry land wheat, but still have the high value land use designation. HB 3456 would change all of that, and make these lands available for nonfarm uses, such as solar. Is this how we want to meet our obligation to Preserve our High Value Farm Lands for future use? We think not.

UEC recently completed going through the Goal 3 exception process to develop a Solar project, they were granted approval for the project. UEC complains about the cost of the process, and its recognized that these costs do increase costs to the energy user, and one must look at the necessary costs as it relates to project viability. Nearly all the testimony given recognizes cost of the process, but fails to deal with the costs and impacts of the loss of high value farm land. This was not addressed, and yet it is the most important cost of all.

UEC submitted pictures of the land that was involved in the Goal 3 process, and implied it was mis designated as High Value Farmland. Whether it truly was or not is not the issue, but does serve as a prime example as to what the goal 3 exception process is for, to evaluate land parcels such as this for suitability for non Farm uses. HB 3456 would eliminate this process and such evaluations would become a thing of the past.

The RSP mandates raise energy cost to all Oregonians, we should not make the situation worse by sacrificing our High Value Farmlands to help UEC with their problem, which is a very short sighted solution. Do what's right and reject this bill!

Dave Price for Blue Mountain Alliance