

Jake Stephens <jstephens@newsunenergy.net>

Dear Representatives:

This e-mail is to provide support for the HB 2322 bill concept of adding renewable energy to Goal 13. This addition is an extremely logical, appropriate change to align land use goals with state renewable energy mandates in order to allow developers of projects and county land review to include this in the balance of considerations for a project permit application. Currently the lack of this explicit balance in the Goals means that, as a matter of practice, EFU status trumps all other concerns, and prevents solar and other renewables from asserting any consideration of counter-balance vs EFU status as projects are considered for approval. This is a worthy goal to support, a good, simple fix.

However: I understand that the bill proposes a LCDC rulemaking process for the implementation of this policy. I strongly oppose and recommend against that course. The law should be implemented immediately by legislative mandate, not by a rulemaking process. Not only is the simplicity of this change conducive to simply updated ORS to implement -- and thus a long bureaucratic (and contentious, burdensome) process not needed (and should be avoided) -- but LCDC/DLCD has shown consistent express explicit hostility to solar. Along the lines of opposing solar on all EFU land in Oregon, irrespective of context. Sending this issue to them undermines the intent and objective of the bill, unnecessarily, at substantial administrative cost and delay to the object. Real viable solar projects will die as a result -- and investment in Oregon will be delayed. The counties can handle this -- and there are other limits already in the ORS/LUDO to limit the bounds of this issue (max acreage), as well as a \*balance\* of goals (which means true high-value must be considered, not just the new goal).

Thanks for your consideration,

Jake Stephens  
CEO  
NewSun Energy