



March 29, 2021

To: Representative Pam Marsh, Chair, House Committee on Energy and Environment  
Members, House Committee on Energy and Environment  
From: Max Greene, Regulatory & Policy Director, Renewable Northwest  
Re: **Support for HB 2520**

Dear Chair Marsh and Members of the Committee,

Renewable Northwest is a regional, non-profit renewable energy advocacy organization based in Oregon, dedicated to decarbonizing the region by accelerating the transition to renewable electricity. Our members are a combination of renewable energy businesses and environmental and consumer groups. **Renewable Northwest supports HB 2520, which tasks the Department of Land Conservation and Development (“DLCD”) to update Statewide Planning Goal 13 (“Goal 13”) through rulemaking.**

Oregon’s land use system is based on formally adopted Statewide Land Use Planning Goals that do not reflect the state’s objectives and values for climate and clean energy. In some cases, these Land Use Goals actively act as barriers to advancing state policy in these areas.

Goal 13 currently addresses Energy Conservation, and since its adoption by the legislature in 1974, Goal 13 is one of the few statewide planning goals that has never been amended or addressed through rulemaking. Our state’s energy landscape has changed significantly since 1974. At the time of writing Goal 13, Oregon’s lawmakers were reacting to the 1973 Arab Oil Embargo and renewable energy played no significant role in the state or world’s electricity landscape. In modern history, Oregon has been a leader in clean energy development. This legislature has passed bold policies to rapidly deploy renewable energy, including a 50% Renewable Portfolio Standard, an elimination of coal in Oregon electricity rates, and a community solar program that is now struggling to get off the ground.

Despite our state government implementing these policies to decarbonize our electricity sector and bring more clean energy jobs to Oregon, none of Oregon’s nineteen Land Use Goals – including Goal 13 – acknowledges climate change mitigation or renewable energy production as a beneficial use of land. By remaining silent on the value of renewables while explicitly recognizing the value of other land uses, the Goals implicitly categorize renewables as less important and, in some instances, as a threat to conservation priorities. Goal 3 outlines the laudable objective “[t]o preserve and maintain agricultural lands,” but a 2019 DLCD rulemaking implementing the Goal has effectively precluded new solar facilities in the Willamette Valley.

The inability to site solar projects that can easily deliver renewable energy to nearby Portland-area population centers threatens the continued viability of Oregon’s Community Solar Program. The Oregon Legislature created the Community Solar Program in 2016 to expand the state’s renewable energy portfolio and make solar energy available to customers across the state who previously did not have access to it, including individuals who rent, live in multifamily housing, or cannot afford the cost of a

rooftop solar installation. The first phase of Portland General Electric's Community Solar program has afforded customers the opportunity to subscribe to about 47 MW of solar projects sited before the 2019 Goal 3 rulemaking, but there are now less than 7 MW of projects in PGE's queue for interested customers beyond the first phase. Although they are not intended to do so, Oregon's Land Use Goals are currently one of the main obstacles to providing more equitable access to buying into renewable energy generation.

Incorporating renewable energy into Oregon's land use system as a beneficial use would remove barriers to climate change mitigation, increase participation in the emerging clean energy economy by frontline communities, and align Oregon's land use system with its climate and energy policy. Climate experts uniformly recognize that effective climate mitigation will require an aggressive transition to renewable energy, and it is vitally important that environmental justice is a central component of this transition. Governor Kate Brown's EO 20-04 reflects both of these principles, declaring that that "transitioning to clean energy resources" is in the public interest (Section 5(A)) and directing agencies to facilitate this transition in a way that "prioritize[s] ... vulnerable populations and impacted communities" (section 3(C)). With the possibility of a 100% clean energy policy passing this session, it is particularly important that Oregon's land use goals be updated as soon as possible to ensure that new renewable resources can be sited in Oregon.

HB 2520 would accomplish this outcome in a thoughtful, deliberate way, creating a diverse advisory committee to help update the scope, content, and name of Goal 13. We are hopeful that this process will result in a balancing of the state's renewable energy policies with our land use goals and objectives.

Renewable Northwest supports robust funding for this rulemaking to help ensure DLCD is able to undertake informed engagement on issues around clean energy and climate. DLCD's lack of expertise of the technical aspects of renewable energy topics will require coordination with other state entities like the Public Utility Commission, and we are happy to see the PUC included in the list advisory committee members.

Renewable Northwest is eager to work with DLCD and other stakeholders to update Goal 13 to include renewable energy. We appreciate DLCD Staff working with us to develop this legislative concept, and we note that we are continuing to work with DLCD and other stakeholders to identify potential amendment language that could reduce the bill's fiscal impact while still addressing barriers to renewable energy development in the Land Use Goals.

**Renewable Northwest is pleased to support HB 2520 as the first step in reconciling the state's land use goals with our clean energy and climate goals.**

Sincerely,



Max Greene  
Regulatory & Policy Director  
Renewable Northwest