



House Committee on Climate, Energy and the Environment  
Oregon State Capitol  
900 Court St. NE  
Salem Oregon 97301

March 18, 2025

Dear Chair Lively, Vice-chairs Gamba and Levy, and members of the committee,

The Oregon Solar + Storage Industries Association (OSSIA) is a trade association founded in 1981 to promote clean, renewable, solar technologies. OSSIA members include businesses, non-profits, and other solar and storage stakeholders. We provide a unified voice of the solar industry and focus exclusively on the solar and storage value chains; from workforce development to permitting, advocacy, policy, and regulation for manufacturing, residential, commercial, community, and utility scale solar and storage projects on the local, state, and regional level.

OSSIA opposes HB 3422. This deceptively simple bill would essentially end large-scale renewable siting at EFSC. The bill seeks to include a county permitting provision into state Energy Facility Siting Council (EFSC) permitting, but that provision would be impossible to implement, making HB 3422 essentially a veto of all renewable projects.

Oregon is already one of the most challenging - if not THE most challenging - states to permit solar projects. Oregon is at an important moment where state and federal policies and incentives are aligned to spur clean energy economic growth. However, Oregon is missing out on opportunities – building renewable projects in Oregon is riskier, more expensive and takes longer. Out of **seven states** one OSSIA member works in, Oregon is the riskiest.

Here is a comparison of permitting timelines between Oregon and Idaho:

	<b>Idaho</b>	<b>Oregon</b>
<b>Small projects</b>	\$5-\$30K, less than six months	\$50-\$100K, 3 mo – 1 year
<b>Large projects</b>	\$10-\$30K, 6 mo -1 year	\$500K-\$2 M, 1-2 years

**If Oregon’s renewable permitting system is not fixed, Oregon will essentially be exporting our climate goals - and the economic development benefits that come with them - to other states.**

These other states may not have our land-use, wildlife and historical artifacts protections – the safer choice for the environment is to site projects in Oregon.



Due to the siting challenges in Oregon, the Legislature in 2023 directed the Department of Land Conservation and Development to create a Rules Advisory Committee (RAC) with the purpose of "Finding Opportunity and Reducing Conflict in Siting Photovoltaic Solar Power Generation Facilities." This RAC included all stakeholders – counties, 1,000 Friends, Cattlemen, Wheat Growers, Farm Bureau, Irrigators, the Nature Conservancy, renewable interests, labor and the tribes and more. The RAC has agreed on several new pathways for permitting after over a year of work and the Land Conservation and Development Commission is set to vote on those new pathways in June.

HB 3422 would take Oregon in the opposite direction and would negate the work over the past year and a half to streamline solar permitting.

HB 3422 tries to fit the square peg of county permitting into the round hole of EFSC permitting. While it may make sense to have a project compare alternative sites in one county, it would be impossible to require a project to compare alternative sites in the entire state. The way the bill is written, a project would have to investigate all possible sites in the entire state and provide those as alternatives. In addition, there are some agency staff that in the past suggested an alternative analysis should include the entire Western United States! No project could ever conduct such analysis. This bill creates too high of a hurdle – no renewables developer would attempt to site projects in Oregon.

Even if a project provided these alternatives, it would still most certainly be appealed, due to the vague – “reasonably accommodate” language. With all projects going through an appeal process, siting of renewables would grind to a halt. In fact, most projects will not even attempt to site in Oregon, since the Land Use Board of Appeals (LUBA) would most likely keep projects from proceeding with the vague language.

As you can see from the written testimony submitted in opposition, farmers and ranchers in areas with little water depend on supplemental income from renewables to keep their farms alive. HB 3422 would take five steps backward on renewable siting, at the exact same time one small step forward is being taken at the agency level.

There are some misconceptions about solar included in some of the testimony that I would like to clear up. It is normal to have fears about new development, but some of the fears expressed are factually untrue. For example, solar does not negatively impact top soil. Solar does not use any cement to install the panels and plants grow underneath the panels. In fact, solar projects are a great place to grow crops – Oregon State University is doing world-class research regarding agrivoltaics and there is a project operating now where solar is providing shade to lettuce plants, that would otherwise die in the hot summer sun. New technology allows a wide variety of crops to be grown

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under panels, which also provide great grazing land for both sheep and potentially cattle. Solar projects can also be built in pivot corners, helping to make use of non-irrigated land.

In addition, solar projects are built in a way to allow some wildlife to travel in and out of solar projects. Fences are built about a foot off the ground to allow small animals to travel in and out and larger animals are kept outside for their own protection. Solar is almost never sited on wetlands and I do not believe any solar currently being considered is proposing to be sited on wetlands, including the Muddy Creek project, which avoids wetlands. All solar projects sited through EFSC are required to having bonding in place for the project's end of life. Any work that would need to be done to remove panels and equipment is already paid for through bonding.

Lastly, and most importantly, solar developers always seek sites that have a path of least resistance. Developers pick sites with the least conflicts, as conflicts cost time and money. Developers go through a huge amount of work to avoid as many conflicts as possible: but in 2025, there are no perfect sites left. If we want renewable energy to be sited in Oregon so that we can realize the economic development and property tax benefits, we need to allow the current process to work.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch". The signature is fluid and cursive, with the first name being the most prominent.

Angela Crowley-Koch  
Executive Director