



April 2, 2019

TO: Representative Ken Helm, Chair, House Committee on Energy and Environment
Members, House Committee on Energy and Environment

FR: Rikki Seguin, Policy Director, Renewable Northwest

RE: Support for HB 2322 -1

Dear Chair Helm:

Renewable Northwest is a regional, non-profit renewable energy advocacy organization based in Oregon, dedicated to the responsible development of renewable energy resources throughout the Pacific Northwest. Our members are a combination of renewable energy businesses and environmental and consumer groups. **Renewable Northwest supports HB 2322 with the -1 amendments, which tasks the Department of Land Conservation and Development (“DLCD”) to update Statewide Planning Goal 13 (“Goal 13”) through rulemaking.**

Oregon’s Statewide Planning Goals are out of date and out of touch with the state’s clean energy and climate objectives. If the state is committed to bringing clean energy jobs to Oregon and reducing greenhouse gas emissions, our land use system must recognize our clean energy and climate goals.

In its current form, Goal 13 addresses Energy Conservation, and since its adoption by the legislature in 1974, Goal 13 is one of the few statewide planning goals to have 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; renewable energy played no real role in the state’s, country’s, or world’s electricity landscape. Today, Oregon is 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 landmark community solar program.

Despite this legislature’s commitment to renewable energy, our land use system has served as a choke point for renewable energy development. Without a statewide planning goal clearly articulating the importance of renewable energy, Oregon’s land use system formally treats renewable energy as a conflict to the state’s land use objectives. This lack of acknowledgement of renewable energy in the land use system makes it more difficult for the state to meet its clean energy objectives. **We must find balance.**

Renewable Northwest supports HB 2322-1’s objective to create a diverse advisory committee to help update the scope, content, and name of Goal 13. We are hopeful that this process will result in incorporating the state’s renewable energy policies into our suite of land use goals and objectives.

Renewable Northwest supports HB 2322 and the -1 amendments, but highlight that we remain confident that decisions related to local siting of renewable energy projects are best left within the control of the counties. DLCD is not the appropriate entity to determine where renewable energy projects should be sited or how much land is appropriate for renewable energy. We are hopeful conversations continuing to clarify this role continue in Ways and Means.



Additionally, given our experience with DLCD's limited ability to thoughtfully engage on issues around clean energy and climate, we recommend robust funding for a rulemaking to Goal 13. An appropriate funding level can help ensure a higher level of engagement with the technical issues that affect renewable energy siting considerations. 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.

Unfortunately the state has already suffered from DLCD's lack of experience on climate and clean energy. Renewable Northwest participated in DLCD's recent solar rulemaking, a rushed process where, at the end of four meetings, the Land Conservation and Development Commission (LCDC) adopted a ban of all solar development on Class I, II, Prime and Unique soils statewide. While adopted as a temporary rule and schedule to be considered for permanent adoption on May 7th, this prohibition is already in effect and very real for the renewable energy industry - essentially banning the Willamette Valley, the area of the state with highest electricity demand, from the table for solar development. Importantly, these rules also undermine community solar before the program has a chance to launch.

Renewable Northwest is eager to work with DLCD and other stakeholders to update Goal 13 to include renewable energy. We appreciate Director Rue's public support for this type of conversation, including before LCDC and members of the legislature. We also appreciate the hard work from DLCD Staff in working to develop this legislative concept.

Renewable Northwest is pleased to support HB 2322 with the proposed -1 amendments as the first step in reconciling the state's land use goals with our clean energy and climate goals.

Sincerely,

Rikki Seguin
Policy Director