Oregon Legislature Ways and Means Committee Joint Subcommittee on Natural Resources Salem, OR 97301

Dear Members of the Committee,

I am writing as Executive Director of Oregon Coast Alliance in opposition to HB 2329A, which would reduce the number and kind of projects required to be sited via the Energy Facilities Siting Council (EFSC).

It is certainly problematic that under this bill the local government or developer can opt for the EFSC process for large renewable energy projects, or opt out. First, the applicant should never have the opportunity to make such a decision, as the result will be a permitting process only in the applicants' interest, not in the public interest. Even limiting the choice to local governments is problematic, since they will be under great pressure by applicants to undertake the permitting process locally. Applicants would in general prefer a less technical and comprehensive permitting process whenever possible.

Most importantly, counties do not have the money, technical expertise or time to undertake thorough review of these often large and complex projects. Oregon Coast Alliance monitors the land use activities of all five coastal counties, and has firsthand experience in the limitations of county budgets and technical expertise. It would be a tremendous disservice to county taxpayers, as well as the public interest overall, to give local governments the option to undertake the permitting for these projects. It would simply create an open door for applicants to exercise undue influence over the permitting process at the local level.

Finally this bill, even as amended, does not provide clear direction as to how it would mesh with LCDC's recently adopted rules regulating siting solar panels on farmland, or the existing rules for forest land siting.

Please oppose HB 2329A as amended.

Thank you,

Cameron

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