

I am in opposition. It appears most of the supportive testimony comes from folks residing in the Western portion of the state and developers. I live on the East side of the Cascades and grew up on a farm.

The suggested EFSC timeline from proposed order to final order is not a one size fits all solution. Larger projects impact more people, properties, and resources. The 12-month timeframe is dangerous and seeks to constrain Oregon Citizen participation. Contested case timelines should be given careful consideration because they often inform site certificate conditions and mitigation plans for impacted people and places. The local Circuit Court must hear appeals for contested cases, ultimately for the Supreme Court to properly consider and accurately base their decisions.

Who would determine the threshold of "Minor Changes" to site boundaries? A quarter-mile boundary change on the Eastern Oregon landscape may look benign on a map but to an agricultural landowner, it might render impacts that are impossible to remedy.

Agriculture lands provide food and have been protected by Exclusive Farm Use zoning, which is now eroding through exceptions both in EFSC and DLCD. Developers want to site their projects on these cleared lands for ease of construction and have done so in Morrow County to achieve proximity to the "Grid." Transmission developers consistently site their projects to achieve least-cost routes that plow through prime croplands and increase wildfire risk along the way. They seek less challenging engineering that comes with non-resource or marginal land routing. I believe those non-resource/marginal lands are the only areas they should be allowed to build.

Exceptions to EFU zoning, especially on dry-land crop systems, by EFSC and DLCD give developers permission to take out of production some of the best soils, and most efficient, energy conserving cropping systems in Oregon. See: (Applied Energy, A case study of energy use and economical analysis of irrigated and dryland wheat production systems. R. Ghorbani, F. Mondani, S. Amirmoradi, H. Feizi, S. Khorramdel, M. Teimouri, S. Sanjami, S. Anvarkhah, H. Aghel, Jan 2011)

Ultimately, Environmental Justice communities (Rural Cropland owners) will likely be the target of this Bill. Citizens that look like they have land to spare for the greater good, are characterized as having the least private injury. Yet none of these condemning developers live under and experience a farmer's avoidance and exposures of a 500kV transmission line. Farmers cannot park under them, they get shocked by the electromagnetic field, they fight noxious weeds brought in by the Right of Way, they hear Corona noise, and must be careful to avoid any conduit of smoke, dust devil, water spray or chaff cloud that will electrocute them. God help them if equipment breaks down under the line. These peaceable folks are quietly tending their crops & livestock and lack the legal resources required to defend their family, property, and livelihood.

A Site Certificate is not in place to determine Public Convenience and Necessity for condemnation of land. It is a completely different process of study that is not duplicative of the Oregon Public Utility Commission's task to determine necessity. Then, the proposed "regional transmission authority" will specialize in exceptions to EFU zoned lands (like EFSC and DLCD do now) and will likely consist of developers that get to decide "statewide significant" projects to further their interests. Are we getting to the point where Electricity production and transmission Trump Food Production? The urgency for electricity needs to be tempered with conservation practices and solutions.

With Concern, Wendy King