

Submitter: Joel Geier  
On Behalf Of: myself as bird and farmland conservationist  
Committee: House Committee On Climate, Energy, and Environment  
Measure, Appointment or Topic: HB3422

While I generally support expansion of solar power generation capacity, I have now seen multiple instances in which projects in Oregon have been proposed for agricultural working lands which can also be significant as habitat for imperiled grassland birds.

The most recent example is an enormous "energy park" proposed to be installed on prime farmland in Linn County south of Brownsville. This area is well-known to host a significant population of streaked horned larks, which are federally listed birds found only in the Willamette Valley and south Puget Sound area.

Grass-seed farming, as the main type of agriculture in the county known as the "Ryegrass Capital of the World," is known to be sufficiently compatible with this species that the 2013 federal listing decision included a Section 4(d) rule exemption for agriculture. This decision was in part based on recognition that conventional agriculture helps to maintain the open landscapes that streaked horned larks require.

Arrays of solar panels in the proposed "energy park" would clearly disrupt nesting habitat for this species. This would be a permanent change in the landscape, unlike changes from one crop to another which can be reverted over time.

When I attended a community meeting on the Brownsville project, I was surprised to hear from Oregon Department of Energy officials that Oregon provides a way for solar projects like this to make what amounts to an "end-around" (in football terms) of normal land-use planning processes.

The provisions for consideration of impacts on wildlife are very weak, apparently requiring only a sign-off by an ODFW district biologist. It's common knowledge among bird conservationists that ODFW's non-game division is severely underfunded, so the agency lacks in-house expertise to evaluate risks to non-game species like the streaked horned lark.

I support this legislation, as a way to prevent irredeemable mistakes that could result from the "end-around" that Oregon statute currently allows.

Thank you for your consideration of my testimony.