



February 15, 2021

To: Senator Kathleen Taylor, Co-Chair, Joint Committee On Ways and Means  
Subcommittee On Natural Resources  
Representative Jeff Reardon, Co-Chair, Joint Committee On Ways and Means  
Subcommittee On Natural Resources  
Members, Joint Committee On Ways and Means Subcommittee On Natural Resources  
From: Max Greene, Regulatory & Policy Director, Renewable Northwest  
Re: **Testimony re: SB 5530**

Dear Co-Chair Taylor, Co-Chair Reardon, and Members of the Committee,

Renewable Northwest is a regional, non-profit renewable energy advocacy organization based in Oregon, dedicated to decarbonizing the region by accelerating the transition to renewable electricity. Our members are a combination of renewable energy businesses and environmental and consumer groups. The Oregon Solar Energy Industries Association (OSEIA) is a trade association founded in 1981 to promote clean, renewable, solar technologies. OSEIA members include businesses, non-profit groups, and other solar industry stakeholders. We provide a unified voice of the solar industry and focus exclusively on the solar value chain; from workforce development to permitting, advocacy, policy, and regulation for manufacturing, residential, commercial, community, and utility scale solar projects on the local, state and regional level. **Renewable Northwest and OSEIA encourage the Committee to ensure the Department of Land Conservation and Development ("DLCD") has sufficient funding to align Oregon's land use system with the state's climate, energy, and environmental justice goals.**

Oregon's land use system is based on formally adopted Statewide Land Use Planning Goals that do not reflect the state's objectives and values for climate, energy, and environmental justice. In some cases, these Land Use Goals actively act as barriers to advancing state policy in these areas.

Despite our state government implementing policies such as the Renewable Portfolio Standard that seek to decarbonize our electricity sector and bring more clean energy jobs to Oregon, none of Oregon's nineteen Land Use Goals acknowledge climate change mitigation – including renewable energy development – as a beneficial use of land. By remaining silent on the value of renewables while explicitly recognizing the value of other land uses, the Goals implicitly categorize renewables as less important and, in some instances, as a threat to conservation priorities. Goal 3 outlines the laudable objective “[t]o preserve and maintain agricultural lands,” but a 2019 DLCD rulemaking implementing the Goal has effectively precluded new solar facilities in the Willamette Valley.

The inability to site solar projects that can easily deliver renewable energy to nearby Portland-area population centers threatens the continued viability of Oregon's Community Solar Program. The Oregon Legislature created the Community Solar Program in 2016 to expand the state's renewable energy portfolio and make solar energy available to customers across the state who previously did not have access to it, including individuals who rent, live in multifamily housing, or cannot afford the cost of a rooftop solar installation. The first phase of Portland General Electric's Community Solar program has afforded customers the opportunity to subscribe to about 47 MW of solar projects sited before the 2019 Goal 3 rulemaking, but there are now less than 7 MW of projects in PGE's queue for interested customers beyond the first phase. Although they are not intended to do so, Oregon's Land Use Goals are currently one of the main obstacles to providing more equitable access to buying into renewable energy generation.

Incorporating renewable energy into Oregon's land use system as a beneficial use would remove barriers to climate change mitigation, increase participation in the emerging clean energy economy by frontline communities, and align Oregon's land use system with its climate and energy policy. Climate experts uniformly recognize that effective climate mitigation will require an aggressive transition to renewable energy, and it is vitally important that environmental justice is a central component of this transition. Governor Kate Brown's EO 20-04 reflects both of these principles, declaring that "transitioning to clean energy resources" is in the public interest (Section 5(A)) and directing agencies to facilitate this transition in a way that "prioritize[s] ... vulnerable populations and impacted communities" (section 3(C)). With the possibility of a 100% clean energy policy passing this session that may include standards for community renewables—not to mention the pressing threat of climate change—it is particularly important that Oregon's land use goals be updated as soon as possible to reflect the state's climate, energy, and environmental justice goals and values.

To that end, the DLCD budget reflected in SB 5530 would direct \$800,000 toward "a review of Oregon's land use planning goals and ... the development of new rules in support of environmental justice, equity and climate." Our organizations support updating Oregon's land use goals and DLCD's rules to better align with state policy on climate, energy, and environmental justice. This work is necessary to address the barriers to renewable energy development discussed above and to improve access to community renewable energy. The proposed \$800,000 is a good start, and we hope to see additional funding toward this important work in future sessions as well.

Sincerely,



Max Greene  
Regulatory & Policy Director  
Renewable Northwest



Angela Crowley-Koch  
Executive Director  
Oregon Solar Energy Industries Association