



UNIVERSITY OF OREGON

Mr. John Van Landingham, Chair
Land Conservation and Development Commission
c/o Department of Land Conservation & Development
635 Capitol Street NE, Suite 150
Salem, OR 97301-2540

June 15, 2010

RE: Solar farms and land use planning

Dear John Van Landingham,

It is time to start planning for the solar energy contribution to the region's energy mix. Oregon and the Northwest are moving towards a more sustainable energy mix and energy efficiency, conservation, and all renewable technologies have appropriate roles to play in the region's energy future. Conservation and energy efficiency can meet only a portion of the region's growing energy requirements and hydroelectric resources in the region have been fully developed. Wind generation is showing great promise and during the next five to ten years, 5,000 MW of wind generating facilities in the Northwest are being planned.

Both wind and hydro are winter peaking resources. Solar is a summer peaking resource and significant deployment of solar energy technologies is needed to meet the growing summer electrical loads. To create a balanced renewable energy mix for the region, between 1,000 and 5,000 MW of solar generation will be needed. While some solar energy can be generated on rooftops and along highways, the majority will be generated in the sunnier areas of Oregon on underutilized land.

Oregon is at the forefront of research and development for the next generation of solar panels. A collaboration of Oregon's universities, private industry and developers are working on a myriad of concepts that would make solar panels more efficient, less expensive and feasible for mass manufacturing. Identifying areas in Oregon where solar farms can be established will spur the solar industry and reduce the time, risk, and cost for deploying solar systems. With much of the state east of the Cascades having excellent solar energy resource but poor agricultural value, Oregon should work together with the R & D efforts, facilitate local deployment of technologies manufactured in the state, and be a leader in developing and utilizing solar farms.

Studies that UO Solar Radiation Monitoring Laboratory conducted in 1980 for the Oregon Department of Energy showed that large tracks of land in central and south eastern Oregon are suitable for large scale solar developments. The optimum choices are lands which have marginal utilitarian value and are located near existing transmission lines. Some of this land is under forest and agricultural use and therefore not suitable for solar development. However, there are hundreds of thousands of acres in central and eastern Oregon that are not suitable for sustainable farming or forestry.

A "solar farm" can range in size from several megawatts to 100 MWs. In terms of the land mass required for such energy production, the range will be between 10 to 1000 acres. In Germany, 10 to 50

MW (30 to 150 acres) solar farms have already been installed and the incident solar energy in Germany is significantly less than in Oregon. In Oregon, with our large underutilized rangeland, we should be looking at solar farms of 100 or more acres per installation to make these installations economically viable.

With proper planning and management, solar farms can provide local jobs and income and help revitalize local economies. In order to provide for an orderly and sound deployment of solar farms in Oregon, lands suitable for solar farms should be indentified with clear, consistent, and easy to use guidelines for permitting. This identification and permitting process would make solar development less risky and make Oregon more attractive to those interested in installing solar farms in Oregon. To minimize the need to install expensive transmission lines, initial sites should be located near transmission corridors. The transmission requirement initially excludes land in the more remote areas of Oregon. However, there are considerable areas in central and eastern Oregon located near transmission corridors that have a good solar resource and that are of marginal value for agriculture and do not have access to irrigation. Developing a clear policy and guidelines for deployment of solar farms on these poor agricultural lands will move Oregon closer to national leadership in solar energy and help sustain the economies in central and eastern Oregon.

Information enquires from planners and the solar industry have prompted me to write this letter. This is an important and timely issue and I suggest that it be added to the DLCD Policy Agenda for the 2009-2010 biennium to assure that state land use regulations properly address utility scale solar farm proposals in Oregon.

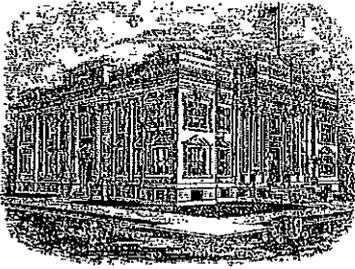
Sincerely,



Frank Vignola

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Email: fev@uoregon.edu
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Cc Jon Skidmore



WASCO COUNTY

Board of County Commissioners

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(541) 506-2520
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Dan Ericksen, *Chair of the Board*
Sherry Holliday, *County Commissioner*
Bill Lennox, *County Commissioner*

July 7, 2010

John VanLandingham, Chair
Land Conservation & Development Department
c/o Department of Land Conservation & Development
635 Capitol St. NE, Suite 150
Salem 97301-2540

DEPT OF
JUL 09 2010
LAND CONSERVATION
AND DEVELOPMENT

Re: Commercial Scale Solar Energy Projects on EFU Zoned Land

Dear Chair VanLandingham,

Jefferson County has recently created the Solar Farm Technical Advisory Committee (SoFTAC) to evaluate the opportunities and barriers to commercial scale solar energy projects in Oregon. One of the issues they are looking at is the Goal 3 exception requirement from OAR 660-33-0130 (17) & (22).

(17) A power generation facility shall not preclude more than 12 acres from use as a commercial agricultural enterprise unless an exception is taken pursuant to OAR chapter 660, division 4.

(22) A power generation facility shall not preclude more than 20 acres from use as a commercial agricultural enterprise unless an exception is taken pursuant to ORS 197.732 and OAR chapter 660, division 4.

This requirement is intended to ensure the protection of Oregon's commercial agriculture areas, and Wasco County agrees that a Goal 3 exception to site power generation facilities on productive agricultural land offers appropriate protection for these valuable resources.

However, not all Exclusive Farm Use land was created equal, and Wasco County's diverse climate offers a glimpse into the wide variety of commercial agricultural activities that can reasonably be employed. The northern part of Wasco County has sufficient rainfall and water rights to support a long established and flourishing cherry industry. Valleys and other low areas offer rich soils and sufficient moisture for hay and other irrigated grass crops. Drier areas with suitable soils provide thousands of acres for wheat and other dry crops, and south facing slopes with sufficient water rights offer access into a burgeoning grape/wine industry.

These are all important to the economic vitality of Wasco County and we support the Goal 3 exception requirement for commercial scale energy projects in areas such as these. However, there are other areas in southeastern Wasco County zoned Exclusive Farm Use that are best suited for sage brush and juniper and can only support dispersed, low density cattle grazing due

to poor soils and lack of water. These properties are typically measured in thousands of acres rather than the hundreds of acres. This is the habitat where Wasco County believes would be well suited to support commercial scale solar facilities because they would not materially alter any individual agricultural operation. It is in these areas where we believe it would be appropriate to allow commercial scale solar energy projects without having to meet the Goal 3 exception requirement.

In 2008 Wasco County staff participated in an LCDC rulemaking group to evaluate the impacts of commercial scale wind energy projects on Exclusive Farm Use zoned lands and make recommendations. One of the recommendations from this group that was adopted by LCDC was to eliminate the Goal 3 exception requirement because it was not applicable to the dispersed nature of wind energy. Removing this requirement did not result in a negative impact to "commercial agricultural enterprises" but it did remove the uncertainty of developers about the ability to meet this requirement. We believe the same result can be achieved by creating a more nuanced approach to the Goal 3 exception requirement on Exclusive Farm Use zoned properties with regard to commercial scale solar energy projects. A test related to soils, water availability and existing agricultural operations as identified by OSU Extension, the Oregon Department of Agriculture or the USDA Farm Service Agency could ensure productive farmland would still be protected by requiring a Goal 3 exception for commercial solar energy projects, but would allow projects on marginally productive lands to proceed without the additional time, cost, and uncertainty associated with the exception process.

Oregon's renewable portfolio standard requires 25 percent of large utility retails sales of electricity to be from newer, cleaner sources of energy by 2025. One of LCDC's high priority policy agenda item and rulemaking projects for the 2009-11 biennium is assisting communities in preparing for the effects of climate change, in coordination with other state agencies and other stakeholders. Wasco County and its citizens are in need of additional economic opportunities which complement and do not jeopardize or displace existing industries. Removing the Goal 3 exception requirement for lands with marginal productivity will help to achieve all of these. We therefore support Jefferson County and the SoFTAC in this effort and respectfully request that you consider it as well. Should you decide to move forward we would be happy to have our Planning staff assist DLCD staff in drafting new language.

Sincerely,

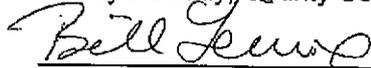
WASCO COUNTY BOARD
OF COMMISSIONERS



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- c: Richard Whitman, DLCD Director
- Katherine Daniels, DLCD Farm & Forest Specialist
- Jim Johnson, Oregon Department of Agriculture Land Use & Water Planning Coordinator
- Jon Skidmore, Jefferson County Planning Director

August 25,2010

John VanLandingham, Chair

Land Conservation and Development Commission

635 Capital Street NE, Suite 150

Salem, Oregon 97301-2450

RE: Committee for evaluation of possible changes to the 12/20 Rule for Solar Facilities

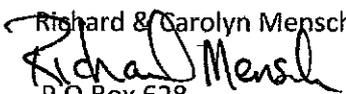
Dear Chair VanLandingham:

I am a member of a group of citizens called the Concerned Citizens of North Lake County (CCONLC), many, if not most, of whom are farmers and ranchers. The members of the CCONLC share the goal of preserving agricultural lands in northern Lake County and throughout the state of Oregon. It has come to our attention that the LCDC has formed a committee to analyze a requests to modify or eliminate the "12/20 Rule" (OAR 660-033-0130(17) & (22)) that protects agricultural land from large solar energy facilities. Farmers and ranchers must have a voice in the committee process. However, due to the timing of the committee, it will be a burden for farmers and ranchers in this area to be involved in the committee.

We ask that you postpone the committee until November 1, 2010 in order for farmers and ranchers complete the harvest season. This postponement will allow agriculturalists to serve on the committee without asking them to take time away during a very specific production season. Decisions and/or recommendations should not be made without representation of all interested and invested parties.

Thank you for your time and consideration in this matter.

Very truly yours,

Richard & Carolyn Mensch

P.O.Box 628



Christmas Valley, OR 97641

August 25, 2010

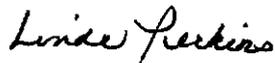
John VanLandingham, Chair
Land Conservation and Development Commission
635 Capital Street NE, Suite 150
Salem, Oregon 97301-2450

Dear Sir,

I would like to ask you to please postpone until after the harvest season the requests to change or do away with the Goal 3. This is a very important issue to agricultural producers and yet you only had one farmer present at the SofTac presentation on July 22. We are extremely busy at this time of year on the farm. We only learned of that July meeting two days before July 22.

Your Goals were developed with sound consideration and much forethought to the future of the State of Oregon and it seems now in a short period of time Goal 3 will be changed forever by a special interest group with out any thought to how this very important change will effect everything else. What I personally think could be unforeseeable consequences. It needs close scrutiny from all sides. I beg you please for a postponement to this matter until after November until we are all finished with our harvest season.

Thank You Very Much



Linda Perkins

August 26, 2010

John VanLandingham, Chair
Land Conservation and Development Commission
635 Capital Street NE, Suite 150
Salem, Oregon 97301-2450

RE: Committee for evaluation of possible changes to the 12/20 Rule for Solar Facilities

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Thank you for your time and consideration in this matter.

Very truly yours,

Martine E. Dale Land

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