

Agenda Item B Staff Report Attachment 2:
Comments on Draft Proposed Order on Request for Amendment
1 of the Boardman Solar Energy Facility Site Certificate

September 24, 2021 EFSC Meeting

DPO Comment Index

Commenter Name	Commenter Affiliation/Organization
Don Russell	Morrow County Board of Commissioners, Chair
Seth Thompson	Oregon Department of Aviation, Aviation Planner
Julia Pommert	Member of Public



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Board of Commissioners

Commissioner Don Russell, Chair
Commissioner Jim Doherty
Commissioner Melissa Lindsay

September 1, 2021

Chase McVeigh-Walker, Senior Siting Analyst
Oregon Department of Energy
550 Capitol Street N.E., 1st Floor
Salem, OR 97301

RE: Boardman Solar Energy Facility, Request for Amendment 1 (RFA1)

Dear Mr. McVeigh-Walker,

Morrow County appreciates the opportunity to comment on the Boardman Solar Energy Facility Request for Amendment 1 (RFA1). It is our understanding that RFA1 seeks only to extend the permit timeline and construction period, and that no other changes are proposed for the approximately 798-acre project.

The Department issued its Draft Proposed Order recommending approval of the amendment. The Energy Facility Siting Council is accepting comments until September 6, 2021.

Morrow County, acting as both the Board of Commissioners and the Special Advisory Group, does not object to the proposed extension. The change, if approved, would make the new construction commencement deadline February 23, 2024 and the new construction completion deadline February 23, 2027.

The Planning Department authorized an extension of the Conditional Use Permit (CUP-N-33-2018). That extension expires November 21, 2021. If approved by EFSC, the amended Site Certificate will likewise require an amended Conditional Use Permit. A Zoning Permit will also be required for each individual tax lot within the project boundary.

Additionally, we request the facility owners and developers coordinate in advance of the construction to secure a Road Use Agreement from Matt Scrivner, Morrow County Public Works Director.

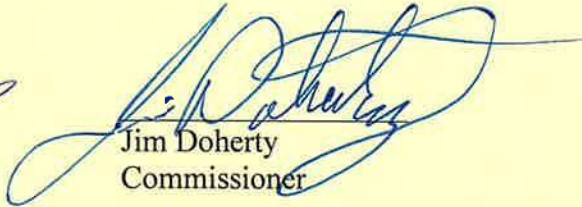
As always, Morrow County appreciates the opportunity to coordinate with you and other Department staff. Should you have any questions about this comment letter, or need additional

information, please do not hesitate to contact Tamra Mabbott, Planning Director, 541-922-4624.

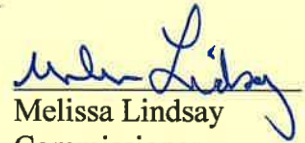
Sincerely,



Don Russell
Chair



Jim Doherty
Commissioner



Melissa Lindsay
Commissioner

Cc: Gilliam County Court
Michelle Colby, Gilliam County Planning Director
Port of Morrow
Mike McArthur, Director, Community Renewable Energy Association (CREA)
Matt Scrivner, Morrow County Public Works Director
Mike Gorman, Morrow County Assessor
Tamra Mabbott, Morrow County Planning Director



Kate Brown, Governor

Oregon



TO: Chase McVeigh-Walker, Senior Siting Analyst
Oregon Department of Energy
550 Capitol St N.E., 1st Floor
Salem, OR 97301

FROM: Seth Thompson, Aviation Planner
Oregon Department of Aviation
3040 25th Street, SE
Salem, OR 97302-1125
503-378-2529
Seth.Thompson@aviation.state.or.us

DATE: September 3, 2021

RE: Oregon Department of Aviation Agency Report on the Draft Proposed Order on Request for Amendment 1 (RFA1) and Complete RFA1 of the Boardman Solar Energy Facility

The Oregon Department of Aviation (ODA) appreciates the opportunity to review and comment on the Draft Proposed Order on Request for Amendment 1 (RFA1) and Complete RFA1 of the Boardman Solar Energy Facility. The ODA has reviewed the proposal and provides the following report and comments.

The site certificate amendment request seeks to extend the construction commencement and completion deadlines by three years each. The ODA has no comment regarding the site certificate amendment request. However, the Boardman Solar Energy Facility is positioned between the Boardman Airport in Morrow County and the Arlington Municipal Airport in Gilliam County. For this reason, the ODA wishes to address the potential impacts of glare caused by the solar energy facility to aviation safety.

In the 2018 Boardman Solar Energy Facility Application for Site Certificate Final Order, the "Applicant describes in ASC Exhibit L (and elsewhere in the ASC), that it would use solar modules that incorporate anti-reflective technology, which would substantially reduce glare from the facility."ⁱ In addition, the Applicant performed a "glare/glint analysis using the Sandia Solar Glare Hazard Analysis Tool" and also received a "determination of no hazard to air navigation" from the FAA.ⁱⁱ

The ODA appreciates the applicant's efforts to address the potential impacts of glare caused by the solar energy facility. However, due to the positioning of the energy facility, the ODA further encourages the applicant to mitigate the impacts of glare caused by the solar energy facility to prevent interference with aircraft or airport operations at the Boardman Airport and the Arlington Municipal Airport.

The ODA appreciates the opportunity to comment on this proposal. The Department requests to be identified as a party of record for any future applications. If you have any

questions or need clarification on these comments, please feel free to contact me at 503-378-2529 or Seth.Thompson@aviation.state.or.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Seth Thompson', written in a cursive style.

Seth Thompson, Aviation Planner

CC: Heather Peck, Planning & Projects Manager
Oregon Department of Aviation

ⁱ Energy Facility Siting Council of the State of Oregon. *Boardman Solar Energy Facility Application for Site Certificate Final Order*. (2018). Page 109.

ⁱⁱ Energy Facility Siting Council of the State of Oregon. *Boardman Solar Energy Facility Application for Site Certificate Final Order*. (2018). Page 173.

BEFORE THE
ENERGY FACILITY SITING COUNCIL
OF THE STATE OF OREGON

In the Matter of Request for Amendment 1 for
the Boardman Solar Energy Facility Site
Certificate

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)

DRAFT PROPOSED ORDER ON
REQUEST FOR AMENDMENT 1
TO THE SITE CERTIFICATE

ODOE contact: [Chase McVeigh-Walker](mailto:Chase McVeigh-Walker@energy.siting@oregon.gov)
energy.siting@oregon.gov

Public comment **opposed** to delaying solar farm construction in Boardman

Our Oregon legislature passed HB 2021 which “Requires retail electricity providers to reduce greenhouse gas emissions associated with electricity sold to Oregon consumers to 80 percent below baseline emissions levels by 2030”.

According to [OPB this bill includes](#);

- includes \$50 million in grants for community renewable energy projects in cities other than Portland, which [has its own fund](#) for such projects
- allows cities in Oregon to create so-called “[green tariffs](#),” where they agree to pay utilities more money for power from a cleaner mix of sources in order to meet their own climate goals

PGE Vice President of Public Affairs Dave Robertson said in [an emailed statement](#) that the bill's passage is "an important step toward the clean energy future we have been pursuing for Oregon and our customers."

If we are to make this reduction in this period of time, fossil fueled electricity production must be **replaced** by clean energy production. This Boardman solar facility is a step in the right direction. Why would we want to wait an additional 2 years to build this clean electricity producing facility?

The proposed facility owner, Invenergy, [wants the delay because](#) they do not have contracts for the electricity to be produced. This is where the grants and green tariffs of HB 2021 should be called on. Existing fossil fuel electric generation contracts should be bought out and a generation contract made with this solar facility, now.

Do not allow a 3-year extension of this permit. We need the clean energy now to reduce the impacts of Climate Change.

Julia Pommert
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