



**OREGON  
DEPARTMENT OF  
AGRICULTURE**

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Rules Coordinator

Oregon Department of Land Conservation and Development

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**Re: Public Comment on Eastern Oregon Solar Siting Possibilities OAR 660 (4,6,23,33)**

Thank you for the opportunity to provide comments on the proposed rules related to solar siting in Eastern Oregon.

These comments are to express concern regarding the proposed approach to mitigation—specifically, the one-time payments to counties intended to offset the loss of agricultural economic activity due to solar siting. While mitigation is a critical component of balancing Oregon’s clean energy goals with our strong agricultural economy, the current methodology used to determine payment levels is inadequate and does not reflect on-the-ground realities.

The use of USDA Census of Agriculture data and Conservation Reserve Program (CRP) rent estimates to calculate the value of land does not align with actual land costs or income potential. For example, in Morrow County, the state USDA FSA Committee must annually adjust CRP payment estimates because land is not typically leased on a monthly basis. This discrepancy results in underestimating the real economic impact of removing land from productive agricultural use.

Moreover, the one-time payment model fails to account for long-term opportunity costs. These include the lost potential for new agricultural entrepreneurs to establish operations, as well as the broader impact on the community when farming families are pushed out. When these families leave, it reduces the county’s tax base and affects the viability of essential services, including schools and public safety. This erosion of rural community infrastructure cannot be offset with a single payment.

In addition to mitigation concerns, we urge DLCD to consider adopting a cap on the total amount of farmable (or ranchable) land that can be used for solar siting—similar to the Conservation Reserve Program (CRP), which caps participation at 25% of a county’s farmable acreage. Without a similar threshold, we risk piecemeal conversion of high-quality agricultural lands over time, leading to cumulative and irreversible impacts on Oregon’s food systems and rural economies.

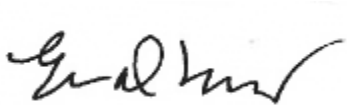
Finally, while proposed rules appear to prioritize protecting Class I and II soils, in practice, solar development often targets the next tier of valuable agricultural land—typically flat, deep-soil areas that are well-suited for livestock grazing or specialty crop production. These lands are an essential part of the agricultural mosaic landscape and should not be viewed as expendable simply because they do not fall into the highest soil classifications.

We strongly urge DLCD to revise the proposed rules to include:

- A more accurate and locally grounded formula for mitigation payments.
- Ongoing or tiered payment structures that reflect long-term losses.
- A maximum percentage cap on the amount of farmland allowed for solar development.
- Recognition and protection of valuable grazing and non-Class I/II agricultural lands.

Thank you for your attention to these concerns and for your ongoing commitment to balanced land use planning respectful of both Oregon’s environmental goals and its agricultural heritage.

Sincerely,



Elin Miller, Chair  
State Board of Agriculture

cc: Lisa Charpillouz Hanson, Director, Oregon Department of Agriculture

