Oregon Environmental Restoration Council Meeting

Wednesday, July 15, 2026
1:00 pm – 3:00 pm

Submitted Written Public Comment

Name	Topic
Rocky Mountain Institute (RMI)'s Brightfield Accelerator	Brightfields information
Oregon Climate and Agriculture Network (OrCAN)	Strategic Priorities

An Opportunity for Oregon Reinvest in Communities and Reduce Energy Burdens by Reactivating Previously Contaminated Sites with Renewable Energy

Background

Oregon has a unique opportunity to leverage part of its $698M in settlement funding to jumpstart statewide investment in "brightfields", or renewable energy on brownfields, closed landfills, and other contaminated sites. This would sustainably reactivate these sites for generations to come while helping meet growing energy demand and support Oregon's 100% clean electricity goal by 2040.

Figure 1 - A 6 MW community solar project on a closed landfill in Montgomery County, Maryland.

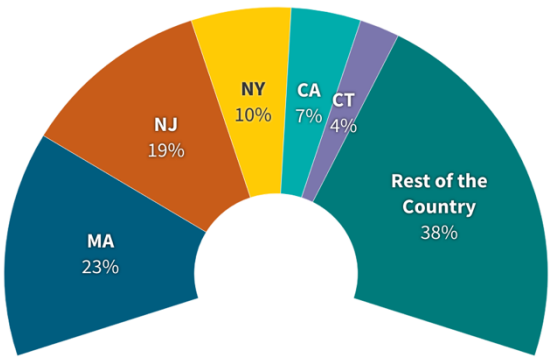
The US EPA has identified over 6,115 of these types of sites that may be suitable for renewable energy. Repurposing just 10% of the available site acreage could preserve up to 122,000 acres of green space and agricultural land, produce up to 17 GW of solar, power 2.8 million households, and reduce 496 million tons of greenhouse gas emissions annually.

This concept note was prepared by the Rocky Mountain Institute (RMI)'s Brightfield Accelerator for consideration by the State of Oregon and the Oregon Environmental Restoration Fund (OERF). RMI is an independent, non-partisan, non-profit partnered with the Center for Creative Land Recycling's Technical Assistance to Brownfields program to provide no-cost technical assistance to state, Tribal, and local governments in EPA Regions 9 and 10 to support brightfields reuse planning.

Why Fund Brightfields?

Brightfields can responsibly reactivate a previously developed site and deliver lasting benefits to communities by turning underutilized brownfields into renewable energy assets. This can help reduce development of greenfields while generating clean electricity, new revenue and jobs, and restorative community investment. However, such projects are often more complex than greenfield projects, involving additional costs for site remediation, specialized design and equipment, and permitting.

Geographic Concentration of Installed Brightfield Projects



Source: EPA Repowering Matrix, 2024

States with intentional policies and practices to encourage brightfields or prioritize siting on brownfields have seen extensive brightfields development. According to the US EPA, just five states—Massachusetts, New York, New Jersey, Connecticut, and California—host ~62% of all brightfields built to date. These are not the sunniest states, rather these states have intentional policies and practices that encourage siting on brownfields.

Figure 2 - A 4 MW landfill solar project in Cuyahoga County, Ohio.

Oregon's Opportunity

Oregon has the potential to become a leader in the restorative energy transition in the western US by incentivizing brightfield projects. Most brightfield strategies either offset project costs with incentives or reduce costs by making projects easier to build. **Such policies and practices do not need to cover all brightfield project costs. Instead, these strategies aim to cover cost differences between brightfield and greenfield projects and make reusing these sites easier and more competitive in the market.**

While states have taken multiple approaches to encouraging brightfields, RMI's Brightfields Accelerator would recommend Oregon embrace strategies that make the OERF go further. This could include, but is not limited to, the following:

- **Brightfields Low-Interest Revolving Loan Fund (RLF):** Create a revolving loan fund to finance project costs for brightfields. Eligible activities could include all project costs, including site prep, remediation, materials, equipment, and labor. The seed capital would create a fund that could be sustained as the low-interest loans are repaid over time, especially if Oregon were to supercharge this by using OERF earnings to recapitalize itself in perpetuity. This could be based on a similar structure to Oregon's Brownfield Properties Revitalization Fund.
- **Create Explicit Project-Based Incentives for Brightfield Projects:** Create a production-based incentive program that explicitly reinvests in renewable energy projects on brownfields and closed landfills. For example, Massachusetts' SMART program provides an incentive for solar projects developed on brownfields and landfills and was specifically designed to offset the cost difference of a brightfield project versus a solar project developed on a greenfield. The policy has led to 382 megawatts (MW) across 140 completed brightfields through 2024 — the most of any state. This is equivalent to powering over 48,000 homes and avoids over 1,500 acres of undisturbed land. Additional bonuses could support projects that hire local labor or are in particularly marginalized communities.

These strategies and other siting preferences could be integrated with Oregon's Community Solar program, which would further help generate local revenue from site reuse, reduce pressure on undeveloped and high-value farmland, and alleviate energy burdens for lower-income communities.

There are many other types of incentive approaches for encouraging reinvestment in communities with renewable energy on brownfields, closed landfills, and other disturbed and contaminated lands. Our team would be more than happy to discuss any aspects of this concept note, including technical assistance available to communities interested in using OERF funding for brightfields, with the Oregon Environmental Restoration Fund Council or other Oregon stakeholders.

To Learn More & Request Technical Assistance

For more information or to discuss potential program design support from RMI's Brightfields Accelerator, contact Matthew Popkin at mpopkin@rmi.org.

OrCAN
Oregon Climate & Agriculture Network
Resilience through soil health

July 13, 2026

To: Oregon Environmental Restoration Council
From: Sophie Els, Oregon Climate and Agriculture Network (OrCAN)
sophie@oregonclimateag.org
Re: Oregon Environmental Restoration Fund (OERF) Strategic Priorities

Co-Chairs Sams and Dembrow, and members of the Oregon Environmental Restoration Council,

I am commenting on behalf of Oregon Climate and Agriculture Network (OrCAN), regarding the development of strategic priorities for the Oregon Environmental Restoration Fund (OERF).

We urge you to consider soil health as a key strategic priority. There is a direct link between soil health and environmental contamination and restoration. Soil health refers to the ability of soil to consistently provide essential ecosystem services such as regulating nutrient cycles, filtering water, mitigating pollutants, sequestering carbon, and supporting agricultural productivity[1].
Soil health practices include:

- no till and reduced tillage
- cover cropping and crop rotation
- mulch and compost application
- rotational grazing
- nutrient management, including reduced pesticide and fertilizer use

Restoration of soils should be a priority for the Fund, as restored, healthy soils absorb and retain more water, making them less susceptible to erosion as well as preventing runoff of nutrients and contaminants into water sources[2]. Soil health practices provide environmental restoration benefits including improved water quality and pollution reduction, through:

- reduced use of pesticides and fertilizers preventing pollution of agricultural soils and nearby waterways;
- improved water infiltration and retention reducing runoff;

[1] Kabato et al (2025) https://doi.org/10.1016/j.scitotenv.2025.180460
[2] https://www.nrcs.usda.gov/conservation-basics/natural-resource-concerns/soil/soil-health

- increased soil stabilization reducing erosion;
- and increased biodiversity and habitat.

Healthy soils have other co-benefits including:

- promoting resilience to drought, floods, extreme heat, and unpredictable weather from improved water infiltration and retention, soil stabilization, reduction of wildfire fuels, and disease and pest resistance;
- climate mitigation from protecting, building, storing, and sequestering carbon and reducing greenhouse gas emissions (from fertilizers and farm equipment);
- economic resilience resulting from the benefits above, increased productivity and reduced input costs.

As the Council deliberates on strategic priorities for uses of the sub-funds for state agency programs and impacted communities, we urge you to consider soil health a key strategic priority.

There are opportunities for collaboration and partnerships across agencies, conservation partners, and land owners and managers to restore and protect critical natural resources by supporting implementation of soil health practices.

The State of Oregon can make a meaningful difference for farmers and ranchers, local ecosystems, and communities that rely upon these resources across the state by investing in soil health and restoration.

Thank you for the opportunity to provide these comments to the Council.

Sophie Els
Policy Coordinator, Oregon Climate and Agriculture Network