

Erik Nobel

From: kaydoolittle@aol.com
Sent: Tuesday, August 24, 2021 8:48 AM
To: Erik Nobel
Subject: Proposed Solar Ordinance

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sorry for the last minute response - have been in Portland arranging memory care for a family member...

Certainly am not an expert in solar; but the following questions/issues come to mind after the recent SSSD land use process and I hope the county will discuss and consider these factors in any forthcoming decision for solar farm policy (if they haven't already done so):

- 1) Weed abatement (especially during drought conditions when wildfire is a danger) - how will it be monitored and enforced if necessary?
- 2) How would water rights for these properties be 'affected' even if preserved?
- 3) What sort of "end of life" removal and restoration standards would the landowners be required to perform?
- 4) How will "end of life" disposal of all materials involved (including Cadmium/Copper/Lithium and other fixtures)?
- 5) What sort of setbacks from adjacent residential properties would be required to protect county residents from electromagnetic radiation sensitivity?

Some other factors to consider -- solar farms (like sewer ponds) are likely to drop surrounding property values because they are ugly - thus dropping revenues for the county.

Solar farms do not (to me anyway) appear to generate jobs for the county once they're built (and chances are at least a good portion of the construction jobs for a site would go to companies or individuals outside Klamath County.

Again - these are some of the things that just come to the top of my mind. It sounds like the County will seek more information from specialists with regard to how the location of a solar farm may affect wildlife and birdlife patterns; I think that's crucial to resolve as well.

Thanks for your service,

Kay Doolittle

9348 Arant Rd.

Klamath Falls, OR 97603



RECEIVED
AUG 24 2021
KLAMATH COUNTY
PLANNING DEPARTMENT

August 20, 2021

Klamath County Commissioners
Donnie Boyd, Chair
Kelley Minty Morris, Vice Chair
Derrick DeGroot, Commissioner
Erik Nobel, Planning Director
305 Main Street
Klamath Falls, OR 97601

Dear Commissioners and Mr. Nobel,

Oregon Solar + Storage Industry Association (OSSIA) is a trade organization with over 80 corporate, non-profit and private members representing Oregon's solar plus energy storage industry in all solar markets. OSSIA promotes clean, renewable solar plus storage policy, continuing education for existing workforce & workforce development.

OSSIA writes to express concern about the solar ordinance under consideration and respectfully requests that the Planning Director, Planning Commission and County Commissioners consider the following issues and amend or delay adoption of the ordinance.

First, OSSIA echoes concerns of landowners that are unable to irrigate their land and who have class three soils. Before the County prohibits solar development on all Class 1 through Class 3 soils, more information is needed about the acreage and number of landowners this decision would impact. While we recognize the importance of water rights and would like to discuss options to protect water rights transfers, excluding Class 3 soils all together would include non-irrigated land, leaving those landowners with little options and depriving the County of potential property taxes and jobs.

Second, OSSIA shares the concern that effectively creating new big game winter range outside of Goal 5 process has not had enough analysis to make a decision right now. More data is needed about how much land would be excluded if a new big game winter range overlay was created in the County's zoning ordinance. In addition, the unintended consequences of this decision are unclear – would adopting this type of “no-go” area prevent solar development in other areas of the County (the areas the County prefers) by blocking access to key transmission infrastructure? OSSIA recognizes the importance of protecting important habitat; climate change is contributing to the reduction of habitat and solar energy is an important way to combat global warming pollution. Solar developers are committed to mitigating impacted habitat and

PO Box 14927, Portland, OR 97293-0927
Email: admin@OSSIA.org
www.orssia.org

EXHIBIT AI
FILE # Clup 8-20

OSSIA

OREGON SOLAR + STORAGE INDUSTRIES ASSOCIATION

will continue to work with communities, counties, and state and federal agencies to address habitat mitigation issues.

Lastly, the County's current review and approval process already allows the County to consider the protection of productive farmland and wildlife. Therefore, we urge the Planning Director, Planning Commission, and County Commissioners to carefully consider adding new restrictions on solar development when the ability currently exists to deny projects which don't meet the criteria, or to allow for changes in the project to better reflect community desires/inputs. There have been and will continue to be instances where landowners intend to change what their land is used for and where solar could be a better option than alternatives. For example, the county recently had to consider different projects at the King Farms site, one of which was an agrivoltaic system that would have combined agriculture and solar, co-existing on the same site. The other project was a wastewater reservoir; keeping some land in agricultural production, even if there was also solar development, should be an option available to the commission and the community.

Solar development has the potential to continue creating jobs and contributing property tax revenue to the county for decades to come and any new restrictions should be considered carefully with sufficient data to fully evaluate the pros and cons.

Sincerely,



Angela Crowley-Koch
Executive Director

PO Box 14927, Portland, OR 97293-0927

Email: admin@OSSIA.org

www.orssia.org

Erik Nobel

From: Diane Brandt <diane@renewablenw.org>
Sent: Monday, August 23, 2021 4:48 PM
To: Erik Nobel
Cc: Max Greene; Amy Berg Pickett
Subject: Comments on Proposed Klamath Solar Ordinance
Attachments: 2021-08-23 RNW Comments re Klamath Solar Ordinance.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Erik,

Please find Renewable Northwest's comments regarding the current proposed Klamath Solar Ordinance, up for discussion at tomorrow's (Tuesday's) planning commission meeting. Please let me know if there are any questions. We are open to any follow-up if it would be helpful!

Regards,
Diane

Diane Brandt
Oregon Policy Manager
Renewable Northwest
HQ: 421 SW 6th Ave, Suite 1400, Portland, OR 97204
www.RenewableNW.org

EXHIBIT AJ
FILE #CLUP 8 20



RENEWABLE NORTHWEST

August 23, 2021

To: Erik Nobel, Klamath County Planning Director
From: Diane Brandt, Oregon Policy Manager, Renewable Northwest
Re: **Proposed Solar Ordinance**

Dear Mr. Nobel;

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 in a responsible and just manner. Our members are a combination of renewable energy businesses and environmental and consumer groups. Renewable Northwest appreciates the opportunity to offer comments on the proposed solar ordinance which is up for discussion at the Planning Commission meeting on August 24, 2021.

The proposed draft ordinance sent to stakeholders on July 15, 2021, would include expanding the excluded areas for solar development to include Class 3 soils and Crucial Winter Range as defined by the Oregon Department of Fish and Wildlife. Recognizing the intent of the ordinance is to protect county resources, these broad exclusions will also greatly narrow the ability for utility solar projects to succeed in Klamath County. This carries economic and other development implications for the County and landowners. Given the recent passage and signing into law of the 100% clean electricity legislation (HB 2021), there is greater need and opportunity for the development of clean energy resources like utility solar installations in Klamath County.


The inclusion of Class 3 soils as an excluded category for solar development would restrict a large portion of acreage from potential development. It is true that an exception could be applied for, should a landowner desire to pursue solar development on their land. However, experience has shown that this process introduces costly delays, has high potential for appeals, and lacks certainty for the landowner and developer. The blanket exclusion also precludes the consideration of current and future innovations – such as dual use applications like agrivoltaics. This emerging practice pairs existing agricultural activity with solar installations, offering dual benefits to the County and landowners through continued crop productivity and clean, solar energy generation (not to mention tax income for the County).

Mr. Erik Nobel, Klamath County Planning Director
Klamath County Planning Department
August 20, 2021
Page 2

As mentioned above, Renewable Northwest supports the responsible development of renewable energy which includes consideration of wildlife and crucial habitat. However, the inclusion of an ODFW designated area which has not benefited from robust stakeholder input in County policy is problematic. This is not meant to dismiss the importance of considering these important areas and their role in species conservation, rather there are concerns around the details of how these areas are defined, how often they might change, and the level of uncertainty it will introduce into the solar facility siting and permitting process.

Renewable Northwest supports the formation of sound policies that both reflect community values and interests and create certainty around renewable energy development. We would encourage further consideration of the implications of the proposed ordinance, including as outlined above, both in terms of how it will impact solar development and the benefits it has to offer the Klamath County community. I would welcome any follow up questions or clarifications, if needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane Brandt", written in a cursive style.

Diane Brandt
Oregon Policy Manager
Renewable Northwest