

August 13, 1996

Mike Katz, Chairman  
Energy Facility Siting Task Force  
1600 S.W. Fourth Avenue, Suite 770  
Portland, OR 97201

Subject: Report on Land Use Issues

Dear Mr. Katz:

Thank you for seeking DLCD comment on the EFSC process for siting energy facilities. We reviewed the above report and found it to be thorough.

The department has historically discouraged supersiting because it moves away from the Oregon land use model: local decision-making within the context of statewide planning requirements. Nonetheless, as the report notes, the legislature has established supersiting procedures for several types of uses, including large energy facilities. If the current process were to be proposed for the first time, the department might well argue against it.

However, today's process has been in place for some time. The department has heard no complaints about it, either from counties or from proponents of facilities. The arguments arrayed in the report in favor of the current process are valid, particularly those having to do with capabilities of small local governments. Change itself is expensive, again, particularly for local governments in rural areas where larger facilities often are sited. Under these circumstances, we do not recommend changes in the EFSC process to address land use issues.

Sincerely,



Richard P. Benner  
Director

RPB:cs

cc: Jim Knight, DLCD  
Paula Burgess, Governor's Office  
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