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July 17, 2024

Oregon Department of Energy

550 Capitol St. NE, 1st Floor

Salem, OR 97301

Subject: Public comment on Sunstone Solar Project (FKA Echo Solar project)

To Whom It May Concern:

I am writing today as Butter Creek Spraying to express my support for the proposed Sunstone Solar Project developed by Pine Gate Renewables. As a Commercial Applicator committed to decarbonization of our electricity grid, investing in clean energy initiatives like this solar project is essential for the state to meet its clean energy and climate goals. In fact, this project alone, once complete, will double the current installed solar capacity in Oregon. This is an opportunity to take a huge stride towards reducing carbon emissions resulting in cleaner air and a healthier environment.

The multiyear construction of this project will result in robust employment and positive downstream economic benefits to local and regional businesses. The long-term operation of the asset will generate significant, stable, tax revenue for Morrow County and additional employment opportunities to support operations and maintenance needs.

Sunstone Solar's strategic location presents a unique opportunity to advance Oregon and Morrow County's clean energy goals. The project will utilize existing transmission infrastructure, is located within a state-designated Critical Groundwater Area, does not have significant conflict with habitat or cultural resources, and has no direct impact on irrigated crops. Importantly, the project has established a first-of-its-kind agricultural mitigation program which will result in significant local economic benefits that seek to offset potential project impacts to agriculture.

In conclusion, I support the Sunstone Solar project and believe it will result in a more sustainable energy future that balances Oregon's need for clean energy with the statewide land use planning goals.

Sincerely,



Mike Brosnan

Butter Creek Spraying

July 17, 2024

Oregon Department of Energy
The Energy Facility Siting Council
550 Capitol St. NE, 1st Floor
Salem, OR 97301

Subject: Support for Permitting the Sunstone Solar Project (FKA Echo Solar Project)

Dear Energy Facility Siting Council:

I am writing as a life-long wheat farmer and former CEO of the Oregon Wheat Commission to express my support for permitting the proposed Sunstone Solar Project developed by Pine Gate Renewables, as well as the work they have done to mitigate the effect on the local economy of converting dry-land wheat land to the Project.

As a farmer in neighboring Umatilla County, I have seen the growth of solar and wind energy projects in North Central Oregon over the years and appreciate the need for the state to have these projects built. The negative effects of climate change are real on Oregonians and we must move as quickly as possible to get renewable projects like this built. The Sunstone Project has been particularly well planned and sensitive to the needs of the local communities.

Sunstone Solar's strategic location presents a unique opportunity to advance Oregon and Morrow County's clean energy goals. The project will utilize existing transmission infrastructure, is located within a state-designated Critical Groundwater Area, does not have significant conflict with habitat or cultural resources, and has no direct impact on nearby irrigated crops.

As a member of the agricultural community, I am also sensitive to the impact that a large-scale project like this could have on the local wheat economy. However, I believe Pine Gate has come up with an innovative solution to mitigate that impact. They have established a first-of-its-kind large agricultural mitigation program which will result in significant local economic benefits that seek to offset potential project impacts to agriculture. The company plans to mitigate these impacts by making substantial investments in the local wheat economy through a new agricultural mitigation fund that was developed with the input of local agricultural organizations and approved by the Morrow County Board of Commissioners. The goals of the fund are to improve the long-term viability and resilience of Morrow County's wheat farms and supporting organizations, and to minimize the economic impact of lost agricultural land resource productivity due to the construction and operation of the proposed Project.

In conclusion, I support the Sunstone Solar Project and believe it will result in a more sustainable energy future that balances Oregon's need for clean energy with the statewide land use planning goals and urge your approval for permitting it.

Sincerely,

A handwritten signature in blue ink that reads "Tom Winn". The signature is fluid and cursive, with the first name "Tom" and last name "Winn" clearly distinguishable.

Tom Winn
Owner, Winn Farming LLC
Helix, Oregon



July 17, 2024

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Vice Chairperson

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Lisa McMeen

Kristina Olivas

Mike Short

Mitch Southwick

Cindy Timmons

Julie Thompson

Executive Director

Ken Daniel

Oregon Department of Energy
550 Capitol St. NE, 1st Floor
Salem, OR 97301

Subject: Public Comment on Sunstone Solar Project (FKA Echo Solar Project)

To Whom It May Concern:

I am writing today as a stakeholder to express my support for the proposed Sunstone Solar Project developed by Pine Gate Renewables. As a stakeholder committed to decarbonizing our electricity grid, investing in clean energy initiatives like this solar project is essential for the state to meet its clean energy and climate goals. This project alone, once complete, will double the current installed solar capacity in Oregon. This is an opportunity to take a huge stride towards reducing carbon emissions resulting in cleaner air and a healthier environment.

The multiyear construction of this project will result in robust employment and positive downstream economic benefits to local and regional businesses. The long-term operation of the asset will generate significant, stable tax revenue for Morrow County and additional employment opportunities to support operations and maintenance needs.

Sunstone Solar's strategic location presents a unique opportunity to advance Oregon and Morrow County's clean energy goals. The project will utilize existing transmission infrastructure, located within a state-designated Critical Groundwater Area, does not have a significant conflict with habitat or cultural resources, and does not directly impact irrigated crops. Importantly, the project has established a first-of-its-kind agricultural mitigation program which will result in significant local economic benefits that seek to offset potential project impacts to agriculture.

In conclusion, I support the Sunstone Solar project and believe it will result in a more sustainable energy future that balances Oregon's need for clean energy with the statewide land use planning goals.

Sincerely,

A handwritten signature in blue ink that reads "Ken Daniel".

Ken Daniel
Executive Director
Blue Mountain Community College Foundation

July 18th, 2024

Oregon Department of Energy

550 Capitol St. NE, 1st Floor

Salem, OR 97301

Subject: Public Comment on Sunstone Solar Project (FKA Echo Solar Project)

To Whom It May Concern:

I am writing today as a business owner in Lexington to express my support for the proposed Sunstone Solar Project developed by Pine Gate Renewables. As a business committed to the decarbonization of our electricity grid, investing in clean energy initiatives like this solar project is essential for the state to meet its clean energy and climate goals. In fact, this project alone, once complete, will double the current installed solar capacity in Oregon. This is an opportunity to take a huge stride towards reducing carbon emissions resulting in cleaner air and a healthier environment.

The multiyear construction of this project will result in robust employment and positive downstream economic benefits to local and regional businesses. The long-term operation of the asset will generate significant, stable tax revenue for Morrow County and additional employment opportunities to support operations and maintenance needs.

Sunstone Solar's strategic location presents a unique opportunity to advance Oregon and Morrow County's clean energy goals. The project will utilize existing transmission infrastructure, is located within a state-designated Critical Groundwater Area, does not have significant conflict with habitat or cultural resources, and has no direct impact on irrigated crops. Importantly, the project has established a first-of-its-kind agricultural mitigation program which will result in significant local economic benefits that seek to offset potential project impacts to agriculture.

In conclusion, I support the Sunstone Solar project and believe it will result in a more sustainable energy future that balances Oregon's need for clean energy with the statewide land use planning goals.

Sincerely, Carol Dougherty

Broken Spoke Restaurant & Saloon



City Of Heppner

Gateway to the Blues

111 N. Main Street – P.O. Box 756

Heppner, Oregon 97836-0756

541-676-9618 – manager@cityofheppner.org

July 22, 2024

Oregon Department of Energy
550 Capitol St. NE, 1st Floor
Salem, OR 97301

Subject: Public Comment on Sunstone Solar Project (FKA Echo Solar Project)

To Whom It May Concern:

I am writing today as the City Manager for the City of Heppner to express my support for the proposed Sunstone Solar Project developed by Pine Gate Renewables. As a City Manager committed to fostering economic growth in our local geographic area, investing in clean energy initiatives like this solar project is essential for the economic and environmental prosperity of our region and state. Morrow County and Eastern Oregon are becoming a hub for these innovative energy projects as we work to attract economic investment from businesses that demand access to clean energy.

The multiyear construction of this project will result in robust employment and positive downstream economic benefits to local and regional businesses. The long-term operation of the asset will generate significant, stable tax revenue for Morrow County and additional employment opportunities to support operations and maintenance needs.

Sunstone Solar's strategic location presents a unique opportunity to advance Oregon and Morrow County's clean energy goals. The project will utilize existing transmission infrastructure, is located within a state-designated Critical Groundwater Area, does not have significant conflict with habitat or cultural resources, and has no direct impact on irrigated crops. Importantly, the project has established a first-of-its-kind agricultural mitigation program which will result in significant local economic benefits that seek to offset potential project impacts to agriculture.

In conclusion, I support the Sunstone Solar project and believe it will result in positive economic impact that balances Oregon's need for clean energy with the statewide land use planning goals.

Sincerely,

John Doherty
City Manager

CLIFF BENTZ
SECOND DISTRICT, OREGON

WASHINGTON D.C. OFFICE:
409 CANNON HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515
TEL: (202) 225-6730
FAX: (202) 225-5774

DISTRICT OFFICES:
14 N CENTRAL AVENUE, SUITE 112
MEDFORD, OR 97501
TEL: (541) 776-4646
FAX: (541) 779-0204

2430 SW 4TH AVENUE, SUITE 2
ONTARIO, OR 97914
TEL: (541) 709-2040



CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES
WASHINGTON, D.C. 20515

HOUSE NATURAL RESOURCES COMMITTEE
CHAIRMAN
SUBCOMMITTEE ON WATER, WILDLIFE,
AND FISHERIES
SUBCOMMITTEE ON FEDERAL LANDS
HOUSE JUDICIARY COMMITTEE
SUBCOMMITTEE ON THE ADMINISTRATIVE STATE,
REGULATORY REFORM, AND ANTITRUST
SUBCOMMITTEE ON COURTS,
INTELLECTUAL PROPERTY,
AND THE INTERNET

July 30, 2024

Oregon Department of Energy
550 Capitol St. NE, 1st Floor
Salem, OR 97301

Subject: Public Comment on Sunstone Solar Project (FKA Echo Solar Project)

To Whom It May Concern:

I am writing today as Representative of the Second District of Oregon to express my support for the proposed Sunstone Solar Project developed by Pine Gate Renewables. As the Representative of Eastern Oregon, I am committed to fostering economic growth in my district. Investing in clean energy initiatives like this solar project is essential for the economic and environmental prosperity of our region and state. Morrow County and Eastern Oregon are becoming a hub for these innovative energy projects as we work to attract economic investment from businesses that demand access to clean energy.

The multiyear construction of this project will result in robust employment and positive downstream economic benefits to local and regional businesses. The long-term operation of the asset will generate significant, stable tax revenue for Morrow County and additional employment opportunities to support operations and maintenance needs.

Sunstone Solar's strategic location presents a unique opportunity to advance Oregon and Morrow County's clean energy goals. The project will utilize existing transmission infrastructure, located within a state-designated Critical Groundwater Area, does not have significant conflict with habitat or cultural resources, and has no direct impact on irrigated crops. Importantly, the project has established a first-of-its-kind agricultural mitigation program which will result in significant local economic benefits that seek to offset potential project impacts to agriculture.

In conclusion, I support the Sunstone Solar project and believe it will result in positive economic impact that balances Oregon's need for clean energy with the statewide land use planning goals. If you require any additional information about this critical project, please do not hesitate to contact me in my Washington, D.C. office.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cliff Bentz", written over a circular stamp or seal.

Cliff Bentz
Member of Congress

August 1, 2024

Oregon Department of Energy
550 Capitol St. NE, 1st Floor
Salem, OR 97301

Subject: Public Comment on Sunstone Solar Project (FKA Echo Solar Project)

To Whom It May Concern:

I am writing today as the Director of the Heppner Chamber of Commerce to express my support for the proposed Sunstone Solar Project developed by Pine Gate Renewables. As a Chamber Executive, committed to fostering economic growth in my district, investing in clean energy initiatives like this solar project is essential for the economic and environmental prosperity of our region and state. Morrow County and Eastern Oregon are becoming a hub for these innovative energy projects as we work to attract economic investment from businesses that demand access to clean energy.

The multiyear construction of this project will result in robust employment and positive downstream economic benefits to local and regional businesses. The long-term operation of the asset will generate significant, stable tax revenue for Morrow County and additional employment opportunities to support operations and maintenance needs.

Sunstone Solar's strategic location presents a unique opportunity to advance Oregon and Morrow County's clean energy goals. The project will utilize existing transmission infrastructure, is located within a state-designated Critical Groundwater Area, does not have significant conflict with habitat or cultural resources, and has no direct impact on irrigated crops. Importantly, the project has established a first-of-its-kind agricultural mitigation program which will result in significant local economic benefits that seek to offset potential project impacts to agriculture.

In conclusion, I support the Sunstone Solar project and believe it will result in positive economic impact that balances Oregon's need for clean energy with the statewide land use planning goals.

Sincerely,



Madison Rosenbalm, Executive Director Heppner Chamber of Commerce



August 6, 2024

Oregon Department of Energy
550 Capitol St. NE, 1st Floor
Salem, OR 97301

Subject: Public Comment on Sunstone Solar Project (FKA Echo Solar Project)

To Whom It May Concern:

The City of Boardman, Oregon wishes to express our support for the proposed Sunstone Solar Project developed by Pine Gate Renewables. As City officials in one of the fastest growing communities in Oregon, we know the importance of investing in clean energy initiatives like this solar project for the economic and environmental prosperity of our region and state. Boardman and Eastern Oregon are becoming a hub for these innovative energy projects as we continue to attract economic investment from businesses that demand access to clean energy.

The multiyear construction of this project will result in robust employment and positive downstream economic benefits to local and regional businesses. The long-term operation of the asset will generate significant, stable tax revenue for Morrow County and additional employment opportunities to support operations and maintenance needs.

Sunstone Solar's strategic location presents a unique opportunity to advance Oregon and Morrow County's clean energy goals. The project will utilize existing transmission infrastructure and is located within a state-designated Critical Groundwater Area.

The Pine Gate Renewables team developing the Sunstone Solar team has already been a thoughtful partner in Boardman's civic groups and initiatives, especially those initiatives focused on finding solutions to providing for both long and short-term housing. We are confident Pine Gate Renewables will continue to play an important and constructive role in our community for many years to come.

Thank you for the opportunity to comment on and express our support for the Sunstone Solar project.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Keefer". The signature is fluid and cursive, with a large initial "P" and "K".

Paul Keefer
Mayor, City of Boardman

August 7, 2024

Oregon Department of Energy

550 Capitol St. NE 1st floor

Salem, Or 97301

Subject: Public Comment on Sunstone Solar Project (Echo Solar Project)

To Whom it May Concern:

I am writing to express support for the Sunstone Solar Project being developed by Pine Gate Renewable.

I am a retired Sherman County dryland wheat farmer who has been active in renewable energy for nearly 25 years. I worked for an international renewable energy development company as a land acquisition agent. I spent several years attempting to develop QF wind farms in Sherman Co. and served on the board of Community Renewable Energy Association for more than 10 years. I support Oregon's RPS and recognize the importance of reaching those goals. Climate change is not going away without a big shift that involves much more carbon free energy.

The Sunstone project is huge. It is needed and more like it. The financial impact to the local economy will be of substance and the developers are making a legitimate and I believe generous offer to minimize the potential financial negatives resulting from diminished grain production through their agricultural mitigation plan.

While I believe there are irrational fears about solar covering a significant portion of our country's productive farm land, having developers cushion the changes associated with Solar vs Ag uses is prudent. My only fear with this mitigation

plan is that this plan may be more generous than some projects can afford, so I hope precedence won't be set that minimizes future project success.

In conclusion, I support the Sunstone Solar project and believe it will provide a more sustainable energy future that balances Oregon's energy needs with land use planning goals.

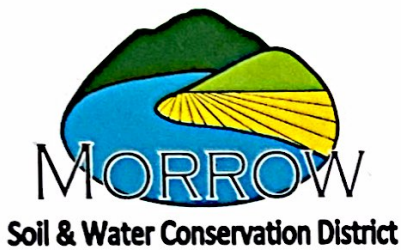
Sincerely,



Don Coats

2918 NW Century Dr

Prineville, Or. 97754



Our Mission: *To conserve, protect, and develop soil, water and other natural resources for the economic and environmental benefit of the residents of Morrow County*

www.morrowswcd.org

430 W. Linden Way, PO Box 127, Heppner, OR 97836-0127

Phone (541)676-5452 Fax (541)676-9624

August 12, 2024

Oregon Department of Energy
550 Capitol St. NE, 1st Floor
Salem, OR 97301

Subject: Public Comment on Sunstone Solar Project (FKA Echo Solar Project)

To Whom It May Concern:

The Morrow Soil and Water Conservation District has appreciated the opportunity to work with Morrow County and Pine Gate Renewables on their agricultural mitigation program for the Sunstone Solar Project. The Sunstone Solar team contacted the SWCD early in the development of their project to seek our input for potential programs to mitigate their impacts on Morrow County's agricultural community. We offered ideas for projects that we believe could have a meaningful impact in supporting Morrow County's agricultural community. The SWCD is particularly excited about the possibility of using proposed Sunstone agricultural mitigation funds to subsidize the adoption of precision weed implements by Morrow County producers. Precision weed technologies have the potential benefits of reducing farmer's costs on crop inputs (fuel, chemical and labor), increase crop yields, and reduce countywide weed control efforts.

Ultimately any distribution of funds from the Sunstone agricultural mitigation fund will need to be approved by the Morrow County Special Advisory Council. We believe this oversight, as described in the County Memorandum of Agreement with Sunstone Solar, is workable and appropriate.

The Sunstone Solar team has taken meaningful steps in the hopes of mitigating any adverse effects their project has on Morrow County's agricultural community. We appreciate their forward thinking and commitment to that goal. We look forward to working with the Morrow County Special Advisory Council to ensure a thriving, sustainable agricultural economy in Morrow County.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin Payne", is written over a white background.

Kevin Payne
District Manager
Morrow Soil and Water Conservation District

August 13, 2024

Oregon Department of Energy
550 Capitol St. NE, 1st Floor
Salem, OR 97301

Subject: Public Comment on Sunstone Solar Project (FKA Echo Solar Project)

To Whom It May Concern:

I am writing today as an employee of SOLV Energy based in our Bend, OR office which has over 40 employees and is about to double our space in Bend later this year. I have also taught energy classes at the OSU Cascades Campus in Bend and had the pleasure of hiring several graduates of the Energy Systems Engineering program to work in technical roles at SOLV Energy.

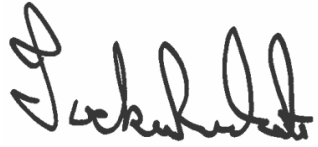
I want to express my support for the proposed Sunstone Solar Project developed by Pine Gate Renewables. As a clean energy professional committed to the decarbonization of our electricity grid, I believe that investing in clean energy initiatives like this solar project is essential for the state to meet its clean energy and climate goals. In fact, this project alone, once complete, will double the current installed solar capacity in Oregon. This is an opportunity to take a huge stride towards reducing carbon emissions resulting in cleaner air and a healthier environment.

The multiyear construction of this project will result in robust employment and positive downstream economic benefits to local and regional businesses. The long-term operation of the asset will generate significant, stable tax revenue for Morrow County and additional employment opportunities to support operations and maintenance needs.

Sunstone Solar's strategic location presents a unique opportunity to advance Oregon and Morrow County's clean energy goals. The project will utilize existing transmission infrastructure, is located within a state-designated Critical Groundwater Area, does not have significant conflict with habitat or cultural resources, and has no direct impact on irrigated crops. Importantly, the project has established a first-of-its-kind agricultural mitigation program which will result in significant local economic benefits that seek to offset potential project impacts to agriculture.

In conclusion, I support the Sunstone Solar project and believe it will result in a more sustainable energy future that balances Oregon's need for clean energy with the statewide land use planning goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Tucker Ruberti". The signature is written in a cursive style with a large initial "T" and "R".

Tucker Ruberti, SOLV Energy

From: [CLARK Christopher * ODOE](#)
Sent: Thursday, August 15, 2024 11:51 AM
To: [CLARK Christopher * ODOE](#)
Subject: FW: Sunstone Solar Project (FKA Echo Solar Project) - TCE Energy Review - GTN Pipeline - Ken Flint Land Representative - More information required - Plan and Profile drawing with respect to TC Energy ROW

Importance: High

From: Ken Flint <ken_flint@tcenergy.com>
Sent: Thursday, August 15, 2024 8:55 AM
To: Energy Siting * ODOE <energy.siting@energy.oregon.gov>
Subject: Sunstone Solar Project (FKA Echo Solar Project) - TCE Energy Review - GTN Pipeline - Ken Flint Land Representative - More information required - Plan and Profile drawing with respect to TC Energy ROW
Importance: High

You don't often get email from ken_flint@tcenergy.com. [Learn why this is important](#)
Good morning,

My name is Ken Flint, and I am the Land Representative for TC Energy. We own, operate, and maintain the GTN Pipeline system that goes through land where the Sunstone Solar Project is being proposed.

Upon initial review of this project, our Engineering has determined that our GTN Pipeline will be impacted. Work scope and plan and profile drawings showing solar projects in relation to TC Energy pipeline and ROW should be submitted for review.

Solar arrays are not permitted to be situated within TCE ROW.

An AC interference study will be required based on preliminary overview of information provided. Per our requirement, any expense on study or remediation is at the expense of applicant/permittee.

Any AC/DC interference study or mitigation will be at the expense of the permittee.

Please confirm receipt of this email, and I look forward to working with you in the near future.

Regards,

Ken Flint
Land Representative, USNG Land Services
ken_flint@tcenergy.com
mobile: 509-991-0804 desk: 509-533-2836



201 West North River Dr Suite 505
Spokane, WA 99201
TCEnergy.com

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Headquarters: 130 Roberts Street, Asheville, NC 28801
Charlotte Office: 301 Camp Road, Suite 104, Charlotte, NC 28206
pinegaterenewables.com

August 15, 2024

Kent Howe
Chair
Oregon Energy Facility Siting Council
Salem, OR 97301
Phone: (503) 378-4040
Fax: 800-221-8035

Re: Sunstone Solar Project - Applicant's Comments on Draft Proposed Order

Dear Chairman Howe,

Applicant Sunstone Solar, LLC and its parent, Pine Gate Renewables, LLC (collectively, Sunstone Solar) are pleased to submit these comments in support of the Sunstone Solar Project (Project) in Morrow County, OR. Sunstone Solar appreciates the Energy Facility Siting Council's (Council or EFSC) consideration of the Project and Application for Site Certificate (ASC), and the Oregon Department of Energy's (Department) issuance of the Draft Proposed Order on the ASC (DPO).

Sunstone Solar strongly supports the Department's overall conclusions in the DPO, which has been thoroughly and thoughtfully prepared. Specifically, Sunstone Solar agrees with the Department's recommendation that the Project complies with all requirements for issuance of a site certificate, including the Oregon Energy Facility Siting Statutes, standards adopted by the Council under ORS 469.501, and all other Oregon statutes and administrative rules identified in the DPO.

Sunstone Solar also supports the Department's specific recommendation that the Project meets applicable land use standards and should be granted an exception from Statewide Planning Goal 3. However, Sunstone Solar wishes to clarify aspects of the Project's economic benefits and Agricultural Mitigation Plan that may have been overlooked in the Department's initial analysis, to highlight the plan's consistency with Department policy and past Council precedent, and to request that the Council recognize Sunstone's economic benefits and its Agricultural Mitigation Plan as an additional reason to justify an exception from Statewide Planning Goal 3.

I. The Project will result in a net economic benefit, including a benefit to the local agricultural economy.

Sunstone Solar recognizes that the preservation of Oregon's agricultural lands and agricultural economy, pursuant to Statewide Planning Goal 3, is a key issue for the Council in considering the ASC. As the Department is aware, the Council may take an exception to a

statewide planning goal when certain criteria are met including, as relevant here, that: (A) reasons justify why the state policy embodied in the goal should not apply and that (B) the project's anticipated significant environmental, economic, social and energy (EESA) consequences have been identified and adverse impacts will be appropriately mitigated. OAR 345-022-0030(4)(c).

Here, the Department recommends the Council find that three specific reasons justify taking an exception from Goal 3:

- 1) The site is locationally dependent on existing transmission and transportation infrastructure and is co-located with other nearby energy facilities, allowing for efficient use of existing infrastructure;
- 2) The site is water-challenged and would not impact irrigated crops; and
- 3) Use of the site would result in minimal impacts to other resources protected by Council standards (including soils, wildlife habitat, recreational opportunities and other protected areas, scenic resources, or unmitigated cultural resources), and the lack of sensitive resources within the proposed footprint is unique for a site of this size. See DPO p. 119-120.

The Department in the DPO also discusses the significant economic benefit from the Project, including specifically the benefit to the agricultural economy. See DPO p. 113-118. The Department notes the economic benefit from the construction and operational phases of the Project, the net increase in tax revenue of \$590 million over the life of the Project, and the positive effect of those investments. However, the Department concludes that the Project's economic benefits are not sufficient to justify an exception to Statewide Planning Goal 3 based on economic benefits and instead states that Sunstone Solar has not provided sufficient evidence demonstrating how the local agricultural economy will benefit as a result of the proposed Project.

Sunstone Solar is appreciative of the Department's recognition that the Agricultural Mitigation Plan addresses the impacts the Project may have on the local agricultural economy. There are several crucial points that support the finding of an additional reason justifying an exception to Statewide Planning Goal 3 based on the economics benefits of the Project.

A. Job Creation in Morrow County

The construction and operation of the Project will generate direct economic benefits by creating permanent full-time operational jobs and direct, indirect and induced economic benefits through construction and operational spending.¹ Construction related spending will support up to 473 full time employees (FTE) (e.g. 2,080 hours of employment, or 40 hours of employment per week for 12 months) in Morrow County, and that the induced and indirect impacts of those jobs would support an additional 69 FTE over the five-year construction period.² In total, Sunstone Solar estimates the construction of the Project will support up to 541 FTE in Morrow County and approximately \$28.8 million in labor income with a total economic output of approximately \$86.9 million. See DPO p. 114. The PV and BESS facilities combined would employ an estimated 173

¹ SSPAPPDoc25-11 ASC Exhibit K Land Use 2024-05-15, Attachment K-2, Section 2.

² SSPAPPDoc25-11 ASC Exhibit K Land Use 2024-05-15, Attachment K-2, Section 2. As used in the Economic Impact Analysis, an FTE is equivalent to 2,080 hours of employment (e.g. full time employment for 12 months).

workers on site during operation with the addition of 132 battery technicians to maintain the BESS facility. See DPO p. 114. Operation of all six phases of the PV and BESS facilities is estimated to support approximately 220 total (direct, indirect, and induced) jobs in Morrow County and approximately \$21.5 million in labor income, with total economic output of approximately \$129 million per year. See DPO p. 113-114.

B. Tax Revenue to Morrow County

In addition to supporting job creation, the construction and operation of the Project will generate economic benefits by generating tax revenues and community service fees for Morrow County and other local taxing districts, including school districts and Rural Fire Protection Districts (RFPD). Sunstone Solar has entered into a long-term Payment in-lieu of Taxes (PILOT) agreement with Morrow County. The agreement provides that Sunstone Solar will pay Morrow County a flat fee of \$7,000 per MW of installed nameplate generating capacity at the site each year for 17 years. In 2022, the total property tax due for the tax lots that make up the site was \$40,128. Assuming that assessed values will increase at a rate of three percent per year, the ECONorthwest Economic Impact Analysis provided in Exhibit K, Attachment K-2, estimates that if the Project was not built, the tax lots would generate approximately \$3.3 million over the 40-year estimated life of the facility. The analysis estimates that if the Project is approved and constructed, the tax lots would generate approximately \$593.3 million over the same period, resulting in a net increase of approximately \$590 million in property taxes to Morrow County. See DPO p. 114. Activities that are financed by tax revenues in Morrow County include roads, law enforcement, public health, public works, land use planning, assessment and taxation, district attorney, juvenile services, and general administration, many of these services benefit the agricultural community. For example, the Ione RFPD is one of the receiving tax districts and provides wildland and structural firefighting services, and also responds to medical emergencies, motor vehicle accidents, rescue calls, and hazardous materials incidents within its jurisdiction. Increased funding for the Ione RFPD could indirectly benefit agricultural activities through the provision of additional funds for wildland firefighting and emergency medical response.

C. Lease Payments to Landowners for Agricultural Purposes

Sunstone Solar will also be making lease payments to participating landowners, which will help stabilize often fluctuating agricultural income and will make their continued farming on adjacent lands more viable. The Council has accepted lease payments made to landowners as an economic benefits reason justifying a Goal 3 exception when the applicant provides evidence of a direct connection between lease payments and specific benefits to significant agricultural operations.³ Sunstone Solar's lease payments to landowners will help keep farmland in the landowner's family and provide money to invest in agricultural equipment for other farming operations.⁴

³ See, e.g., Nolin Hills Wind Energy Facility – Final Order on Application for Site Certificate, NHWAPPDoc1 Final Order (clean) 2023-08-30 signed; and ASC Exhibit K, Attachment K-1, letter from landowner stating the lease payments will be used to invest in ongoing agricultural activities on over 73,000 acres of land, specifically, to improve housing for sheep herders and farm employees and possible acquisition and refurbishment of a contiguous agriculture-related business.

⁴ SSPAPPDoc25-11 ASC Exhibit K Land Use 2024-05-15; Attachment K-1, see Brian Doherty response to Landowner Survey question no. 6 and Shane Matheny response to Landowner Survey question no. 4, respectively; of 1,620 acres Matheny currently farms, 1,280 acres will be part of the proposed solar project, Matheny indicated he will continue to farm 340 acres directly adjacent to the Project.

D. The Agricultural Mitigation Plan and its benefits for the agricultural economy.

In the DPO, the Department concludes that the Agricultural Mitigation Plan should support an exception to Statewide Planning Goal 3 “not as an economic benefit reason but as appropriate mitigation for an anticipated significant adverse effect on the local agricultural economy.” See DPO p. 117. The Department states that compensatory mitigation schemes are not sufficient to justify an economics benefit “reason” but makes specific reference to mitigation under the EESE consequences: “[b]ecause the applicant has used reasonable methods to estimate the potential adverse economic impacts on local dryland wheat producers that could potentially occur from the conversion of up to 9,442 acres of cultivated dryland wheat fields to an energy use, and because the applicant has proposed funding equivalent to mitigate those potential adverse impacts, the Department recommends the Council find that the applicant’s Agricultural Mitigation Plan is appropriate mitigation for an anticipated significant adverse effect on the local agricultural economy and justifies a goal exception...” See DPO p. 118.

First, only recognizing the Agricultural Mitigation Plan as a mitigation for EESE consequences overlooks the significant net economic benefits provided by the Plan. Based on the economic analysis of the indirect impacts of the Project, the Agricultural Mitigation Plan proposes to make a \$1,179 per acre payment into a fund. That fund will not only fully mitigate both direct and indirect anticipated impacts, it will also facilitate projects and programs with operations that will improve the long-term viability and resilience of Morrow County’s wheat farms and supporting organizations. In a memo included in attachment K-3 of the ASC Exhibit K, ECONorthwest modeled the potential impacts of three potential agricultural mitigation projects totaling \$9.6 million in investment through the fund. The conservative estimate of the analysis identified a likely impact of \$11.118 million dollars in economic benefits to the agricultural sector. Thus, the actual results of the proposed investment in these projects will generate a *net positive* impact to the agricultural sector.⁵

What’s more, the projects funded by the Agricultural Mitigation Plan will provide additional substantive benefits to Morrow County’s agriculture economy, as well as the surrounding region. For example, under the Agricultural Mitigation Plan as currently conceived, producers could receive assistance in purchasing precision weed management equipment, which will benefit farmers by reducing costs/labor on chemical spraying and reduce the impact of weed management on the ground itself, those handling the chemicals, and the larger environment. The Agricultural Mitigation Plan also contemplates funding upgrades to the current North Lex grain facility, which would save producers time, potentially increase storage capacity, and maintain the local wheat industry’s stability by funding essential infrastructure repairs. In addition, the Agricultural Mitigation Plan seeks to fund the construction of a new grain storage facility at North Lexington, which will increase capacity, lower the need to store grain outside, and lower insurance risk that producers currently bear with the current outdated facility. These potential projects will do far more than merely compensate for the indirect impacts to the Morrow County agricultural economy.

⁵ If the Project is fully built out, the fund would receive an investment of the full \$11.08 million (\$1.4 million more than the economic investment of \$9.6 million modeled by ECONorthwest), potentially increasing the net benefits well beyond the initial projected windfall.

II. The Project's economic benefits are consistent with Department policy and past Council decisions to grant a reason to justify an exception to Statewide Planning Goal 3.

The conclusion that economic benefits in general or even those supporting the agricultural economy do not justify a “reason” for a Goal 3 exception is inconsistent with ODOE policy and past Council precedent on this subject. As noted in the Department’s 2021 memo on Statewide Planning Goal 3 Exception Reasons, for local economic benefit to constitute a reason justifying an exception, applicants are encouraged to analyze potential economic impacts that could result and show “the proposed facility would create a net economic benefit.” See ODOE 2021 Memo at 5-6 (recommending applicants show “net economic benefit to the resource protected by the goal”).

Since that memo was issued, at least two project approvals have expressly credited economic benefit as a “reason” to justify a Goal 3 exception and make clear that even an indirect connection to the agricultural economy is sufficient to support such a reason. In the Nolin Hills proceeding, the Council concluded that economic benefit was a reason supporting the applicant’s Goal 3 exception because at least some of the lease payments would be used to improve agricultural practices, additional property tax revenue, and execution of a Strategic Investment Program (SIP) (despite that there was no requirement that the SIP spending go to agricultural beneficiaries). See Final Order on the ASC for the Nolin Hills Wind Power Project, at 131 (July 19, 2023). Similarly, in the Obsidian Solar proceeding, the Council credited local economic benefit as a “reason” based on “lease payments to underlying landowners, creation of up to 150 construction jobs,” and a SIP agreement with the county, again, with no earmarking of SIP payments for agricultural benefit. See Final Order on ASC for Obsidian Solar Center at 86-87 (February 2022). In contrast, here, Sunstone Solar is estimated to employ up to 440 workers during peak construction, but even if it is assumed all construction workers are sourced from outside the county due to limited local workforce availability, the Project’s construction spending is estimated to create up to 541 full time jobs in Morrow County. Furthermore, Sunstone Solar is providing additional property tax revenue to Morrow County (up to \$590 million for Morrow County taxing districts), making lease payments to landowners, and significantly has also agreed to an Agricultural Mitigation Plan with Morrow County that requires all investments funded by the plan benefit the local agriculture economy.

With respect to agricultural mitigation and its ability to support an economic “reason,” in the recent Wagon Trail Solar proceeding, the Department recommended in the Proposed Order that the “Council find that the representations and evidence provided related to the economic benefits from the agricultural mitigation fund are a reason justifying a Goal 3 exception.” In the Wagon Trail Solar case, the agricultural mitigation fund proposed a one-time investment of \$170,500 to Oregon State’s Agricultural Research Program and a \$330,000 investment with the Morrow County Grain Growers. That equates to a \$136 per acre investment in the local agricultural economy⁶ as compared to Sunstone’s \$1,179 per acre investment.⁷ Wagon Trail Solar and Sunstone Solar also have similar value for annual indirect impact of disturbed lands: \$56 per acre

⁶ A total investment of \$500,500 divided by 3,685 acres of permanently occupied land equates to about \$136 per acre.

⁷ See attachment K-3 of the ASC Exhibit; see also DPO p. 117.

for Wagon Trail Solar and \$51 per acre for Sunstone Solar.⁸ In light of the Council’s precedents on this issue, Sunstone Solar asks that the Council recognize the Project’s net benefit to the agricultural economy as an additional reason to justify an exception to Statewide Planning Goal 3.

CONCLUSION

Sunstone Solar has worked hard to responsibly site and develop the Sunstone Solar Project consistent with its commitment to stewardship of the land and local community. Through engagement with state agencies, Morrow County, affected Tribes, participating landowners, and other local and regional stakeholders, we believe this Project not only meets Council requirements but also sets a new standard for renewable energy developers in the state.

Sunstone Solar thanks the Department and Council for their consideration of the Project, ASC and the DPO. We appreciate the opportunity to submit these comments and, respectfully, urge the Council to approve the Department’s recommendations in the DPO.

Sincerely,

DocuSigned by:
Logan Stephens
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Logan Stephens
Vice President, Project Development

⁸ For Wagon Trail, the annual indirect output impact is \$205,693 divided by 3,685 acres which equates to about \$56 per acre. For Sunstone, the annual indirect output impact is \$478,566 divided by 9,400 acres which equates to about \$51 per acre.