Marla Rae  
Chair, Oregon Fish and Wildlife Commission  
3406 Cherry Avenue, NE  
Salem, Oregon 97303

Dear Chair Rae and Members of the Commission:

Thank you for allowing us the opportunity to comment on the Oregon Department of Fish and Wildlife (ODFW) “Greater Sage-Grouse Conservation Assessment and Strategy for Oregon” (Draft Conservation Plan). Since 1981, Oregon Solar Energy Industries Association (OSEIA) has represented the state’s solar industry. With over 70 organizations that include manufacturers, installers, utilities, professional service firms, educational institutions, non-profits, and others, our members range in size from sole proprietorships to multi-national corporations. OSEIA’s mission is to promote solar energy, specifically, and renewable energy in broader terms as a means to support sustainable economic development in Oregon.

Solar energy is an abundant renewable resource that helps meet both electricity and thermal heating demands in Oregon. Even our temperate climate enjoys a more plentiful supply than places like Germany, the world’s leader in solar installation capacity. Moreover, the eastern, southern and central regions of Oregon outshine the rest of the state with regard to their solar energy potential.

This tremendous potential, coupled with favorable incentives and Oregon’s supportive regulatory environment, has given rise to hundreds of millions of private sector dollars invested in our state in just three short years. These investments have created new “green collar jobs” in the manufacturing, electrical and plumbing trades to name a few; and while most sectors of Oregon’s economy have contracted, the solar industry has expanded, shedding light on the potential for public-private partnerships to derive greater economic, environmental and community benefits by way of a more sustainable energy path.

The release of the Draft Conservation Plan creates serious concern on the part of our members who are pursuing, or intend to pursue, renewable energy projects in the eastern and southern regions of Oregon where the solar resource is of the highest intensity. We are mindful that these projects have an impact on the land and its inhabitants, such as the Greater Sage-Grouse, and we respect the need to account for their effects on the environment and local communities. However, the Draft Conservation Plan casts a dark shadow over any opportunity for renewable energy development in the aforementioned areas. Moreover, it does little to recognize the potential benefits that such projects provide, such as climate change mitigation and rural job creation, both of which can support the plan’s broader conservation goals. Lastly, the plan’s narrow focus on habitat protection is also in conflict with state and federal directives to promote renewable energy development, particularly in rural parts of the country.

At the August 26th public meeting held by ODFW, the presenter gave a comprehensive overview of the elements of the study which led to the agency’s recommendations contained in the plan.

Oregon Solar Energy Industries Association  
PO Box 14927 • Portland, OR • 97293-0927  
www.oseia.org • admin@oseia.org • 503.853.5804
When asked why climate change and economic development were not addressed in this plan, the reply was that it represents a biological assessment, and those issues were outside of the scope. It is reasonable to conclude that the recommendations of the plan are, in turn, one-sided and fundamentally flawed. As an example, to ignore climate change implies that it poses no threat to land and wildlife in Oregon - a serious omission by any science-based standard. Similarly, to disregard the lost economic development potential, especially in chronically distressed rural communities, denigrates the value of the human species and its struggle to survive. Renewable energy development addresses both of these considerations, yet it is effectively eliminated as a viable option, if the recommendations of the Draft Conservation Plan are implemented in their current form. In short, we need a plan that involves all stakeholders, embodies a balanced perspective, and implements a conservation strategy that complements, rather than conflicts with, broader sustainability goals.

OSEIA is eager to collaborate with your commission, ODFW, and all stakeholders who seek a conservation plan that exemplifies Oregon’s commitment to sustainability by optimizing the benefits of economic, environmental and social capital. OSEIA appreciates your thoughtful consideration of its concerns, and we look forward to your response.

Respectfully submitted,

Glenn Montgomery
Executive Director