



**DEPARTMENT OF THE AIR FORCE
REGIONAL ENVIRONMENTAL COORDINATOR, REGION 10
510 Hickam Ave, Bldg. 250A
Travis AFB, CA 94535**

March 5, 2019

Senator Cliff Bentz
900 Court St. NE, S-403
Salem, OR 97301

Representative Ken Helm
900 Court St. NE, H-90
Salem, OR 97301

RE: Department of Defense Comments on HB 2329; Modifies definition of “energy facility” for purposes of regulation of energy facilities by the Energy Facility Siting Council

Dear Senator Bentz and Representative Helm

As the Department of Defense (DOD) Regional Environmental Coordinator in U.S. Environmental Protection Agency Region 10, which includes the State of Oregon, I am responsible for coordinating military responses on environmental legislative and regulatory matters. I am writing in regards to HB 2329 which if passed would dramatically reduce the State’s oversight and approval authority of renewable energy projects. DOD shares Oregon’s interest in advancing renewable energy and encourages early identification and coordination of proposed projects to insure public safety, protect the environment, and allow for safe and effective military installation, range, and flight operations.

DOD has reviewed HB 2329 and the Armed Services are concerned that the transfer of authority for renewable energy projects from the state to local jurisdictions puts permitting agencies at risk of approving energy projects that conflict with critical DOD land and airspace uses. Wind turbines and transmission lines are of particular concern to the DOD given the hazard they pose to aircraft, radar, and the safety of the pilot. An early notification process to inform the DOD of renewable energy proposals that potentially have an impact on military facilities and operations is necessary to prevent land use and airspace conflicts. Similar processes are in place and working in Washington, California, and other states across the United States. Current federal regulations require that any structure constructed above certain height limits (approximately 200 feet above ground level) or within certain close proximity to military and civilian airports provide notice to the Federal Aviation Administration (FAA) and the U.S. Department of Defense (DOD) Siting Clearinghouse. DOD would need to oppose this bill unless amended to require early notification of proposed renewable energy projects to DOD.

DOD provides valuable feedback to the state in evaluating renewable energy projects with regard to our training areas and offers assistance with coordinating proposed projects that may impact military facilities, which is similar to what we would like to achieve with the Oregon counties. Military facilities in Oregon such as Naval Weapons Systems Training Facility (NWSTF) Boardman located in Morrow County provide essential training in range operations and low altitude airspace for use by DOD units including Naval Air Station Whidbey Island, the Oregon Air National Guard, and numerous other military units. NWSTF Boardman and its associated airspace have a unique combination of attributes that make it a significantly important training area. With this in mind, we respectfully recommend HB 2329 be modified to require early DOD notification of renewable energy projects.

Please contact me if you have any questions or concerns regarding this recommendation. I look forward to discussing our mutual interest in promoting renewable energy in Oregon and can be reached at (707) 424-8290 or through email at robert.shirley.2@us.af.mil.

Sincerely

A handwritten signature in black ink, appearing to read "Robert Shirley", with a long horizontal flourish extending to the right.

ROBERT SHIRLEY
DoD Regional Environmental Coordinator
Region 10