



February 19, 2025

To: Representative John Lively, Chair, House Climate, Energy, and Environment Committee  
Representative Bobby Levy, Vice Chair, House Climate, Energy, and Environment Committee  
Representative Mark Gamba, Vice Chair, House Climate, Energy, and Environment Committee  
Members of the House Climate, Energy, and Environment Committee  
From: Diane Brandt, Policy and Legislative Affairs Director, Renewable Northwest  
Emily Griffith, Oregon Policy Manager, Renewable Northwest

**Re: HB 2375 on Wind Turbine Light-Mitigation: Request for Amendments**

*As Prepared for Delivery*

Good morning, Chair Lively, Vice Chair Levy, Vice Chair Gamba, and members of the committee;

For the record, my name is Emily Griffith, Oregon Policy Manager at Renewable Northwest.

Renewable Northwest (“RNW”) is a regional, non-profit renewable energy advocacy organization based here in Oregon, dedicated to decarbonizing the electricity grid by accelerating the use of renewable electricity resources. Our members include renewable energy developers and businesses, environmental organizations, and consumer groups. I am here today about HB 2375 which would require the installation of light-mitigation systems on new and repowered wind installations in Oregon.

As currently drafted, Renewable Northwest opposes the bill as it has some problematic timelines for wind project development and unclear language on applicability. However, we see these as solvable issues and appreciate the Chief Sponsor’s invitation to offer amendments to clarify and address these concerns. We have worked with our members on suggested language for three provisions of the bill 1) dates of applicability 2) definition of “repowered” and 3) light mitigation technology installation timeline.

There are a couple **dates of applicability** for this bill that we would like to clarify and ensure they are actionable and not overly burdensome for the already lengthy development process for wind projects. We want to ensure that projects already further along in development and the financing process would not be unduly burdened with too-early compliance dates that could derail a project and make implementation of the light-mitigation systems more difficult. As these

systems can be costly, it is important to ensure that these costs are known early enough in the development process to plan and budget accordingly.

Equally, we want to ensure that the definition for a “**repowered**” project - when an existing project is replaced or upgraded with newer, more efficient turbines - is clear. This will be increasingly relevant here given the maturity of Oregon’s wind industry, and the advancement in turbines - we expect to see more repowered projects in the future as they take advantage of efficiency gains in technology and make use of current footprints. As such, we want to ensure the definition in the bill aptly fits a “repower” project and will trigger application at the right time.

We would also like to suggest clarifications on the **light-mitigation technology installation timeline**. The bill currently has a 24 month deadline from the FAA determination to install the systems. Given the growing number of uncertainties in the development process - from delays in supply chain, requirements for other federal permits and approvals and possible delays - there is real potential for a more than 24 month delay in this installation timeline. We would like to suggest language that allows for flexibility on this, with parameters that show due diligence.

As mentioned, we are working with our members on clarifying amendment language that would still accomplish the intent of the bill while also protecting against potential uncertainty and unintended complications in the process that would delay or halt wind projects in Oregon.

Again, as the bill is currently drafted, we are opposed, but appreciate the willingness of the bill sponsor to work on clarifying amendments that would make the bill implementable. Thank you for your time.



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