



OREGON HUNTERS ASSOCIATION

Protecting Oregon's Wildlife, Habitat and Hunting Heritage

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February 26, 2025

Senate Committee on Energy and Environment
RE: SB 969 Opposition

Chair Sollman, Vice-Chair Brock Smith, and Members of the Committee,

The Oregon Hunters Association (OHA) is Oregon's largest state-centric hunter conservation organization, representing over 12,000 sportsmen and women throughout 26 chapters in the state. Our mission is 'to protect Oregon's wildlife, habitat, and hunting heritage' and we strongly support science-based wildlife and habitat management.

OHA is opposed to SB 969, as written. While OHA acknowledges the need for increased deployment of renewable energy technologies, SB 969 contains several components which cause concern for the parallel need of protecting Oregon's fish, wildlife, and critical habitats.

In 2024, when the bill language was previously presented as HB 4090, OHA joined a group of concerned conservation organizations to voice our opposition to the bill. At that time, amendment language was drafted to address some of those concerns. We appreciate the proponents of SB 969 including much of that language in the initial draft of the 2025 bill.

However, we remain concerned regarding three important components:

Federal Uncertainty - The current landscape of federal regulatory framework and authority is wildly uncertain at this time. Removing state regulatory authority in the face of an unpredictable future for the NEPA process has the potential to create an unregulated and unfettered void in the siting process, putting our fish, wildlife, and critical habitats at risk.

Lack of Regulatory Arbiter - As stated previously, we appreciate the inclusion of amendment language from 2024, which included consultation with local government entities and the Oregon Department of Fish and Wildlife (ODFW). However, OHA remains concerned at the lack of a specified arbiter to provide compliance verification.

Positioning ODFW as the regulatory arbiter for compliance is an unsatisfactory solution to this concern. ODFW is currently requesting a fee increase from its user base: the hunters and anglers of the state. This fee increase, supported by OHA and the majority of the sportsmen's community, is to maintain the agency's current service level. With new and additional tasks required to accomplish the requirements of compliance arbiter, ODFW staff will be forced to leave current job duties unfulfilled. Additionally, the creation of a redundant regulatory position within a second agency is unnecessary when the Energy Facility Siting Council (EFSC) is the agency responsible for this regulation.

Lack of Need - At this time, there have been no renewable energy projects built solely on federal lands in Oregon. Given the lack of projects to which SB 969's regulatory change would apply, there is no established need nor proof of a burdensome duplicative process between

state and federal regulatory authorities. The preemptive removal of state regulatory authority, without proof of need, is cause for concern.

There are ongoing conversations between SB 969 proponents and stakeholder organizations, as well as potential amendment language. OHA is involved in these conversations and welcomes ongoing discussions with the goal of providing language which may benefit renewable energy siting needs while also respecting local government needs, local landowner and producer needs, and the needs our Oregon's fish, wildlife, and critical habitats.

Thank you for your time,
Amy Patrick
Policy Director