

Attachment 2



DEPARTMENT OF THE NAVY

NAVAL AIR STATION WHIDBEY ISLAND
3730 NORTH CHARLES PORTER AVENUE
OAK HARBOR, WASHINGTON 98278-5000

3700
Ser N00

Energy Facility Siting Council
Address
Address

Dear Mrs. Crawford:

SUBJECT: OREGON DEPARTMENT OF ENERGY RULEMAKING TO NOTIFY THE
NORTHWEST DOD REGIONAL COORDINATION TEAM

Dear Energy Facility Siting Council,

On behalf of Naval Air Station Whidbey Island and the Northwest Training Range Complex, I offer my support for the Oregon Department of Energy's (ODOE) rulemaking to facilitate a viable notification process to the NW Department of Defense Regional Coordination Team (NW DoD RCT) to assist with the prevention of siting energy projects where they could adversely affect the military's testing, training, and military operations.

The mission of the Northwest Training Range Complex is to provide a realistic safe training environment to accomplish live training and tactics development in training areas and evolve with new and established training requirements. The Northwest Training Range Complex serves as the primary range for surface, submarine, aviation and explosive ordnance disposal units located at Naval Air Station Whidbey Island, Naval Station Everett, and Naval Base Kitsap.

National security interests and competing uses of resources are continually emerging and have the potential to impact DoD operational equities at sea and ashore. Being prepared to analyze, advocate and protect critical DoD interests at the local, regional, and national levels is critical. Implementing the rulemaking to facilitate notification of proposed projects near various testing, training, and operating areas supports an already existing ad hoc process with the ODOE staff while providing an opportunity to address any potential concerns before the project is permitted.

Thank you and your staff for your continued support in protecting the Navy's critical training environment. We value the ongoing collaboration with the ODOE staff and the ability

to ensure viability of a successful coordination process. My point of contact for this project is:
Ms. Kimberly Peacher, cell (360) 930-4085 or email Kimberly.peacher@navy.mil.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Gammache', with a long horizontal stroke extending to the right.

NATHAN. J. GAMMACHE
Captain, U.S. Navy
Commanding Officer
Naval Air Station Whidbey Island

RNW Comments on EFSC Modernization Draft Rules

From Diane Brandt <diane@renewablenw.org>

Date Tue 11/25/2025 9:27 PM

To EFSC Rulemaking * ODOE <EFSC.RULEMAKING@energy.oregon.gov>

 1 attachment (116 KB)

Renewable NW - EFSC Modernization Draft Rules Comments Nov 2025.pdf;

Hello EFSC Rulemaking Staff,

Attached are comments from RNW on the draft modernization rules for consideration. Please reach out with any follow up clarifications or questions.

Thank you,
Diane Brandt

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Diane Brandt

Policy & Legislative Affairs Director

Renewable Northwest

HQ: 421 SW 6th Ave, Suite 1400, Portland, OR 97204

www.RenewableNW.org





November 25, 2025

TO: EFSC Rules Coordinator, Oregon Department of Energy

FROM: Diane Brandt, Policy and Legislative Affairs Director, Renewable Northwest

RE: Comments on EFSC Rulemaking on Modernization

Renewable Northwest (RNW) is a regional, non-profit renewable energy advocacy organization based in Oregon. Our mission is to decarbonize the Northwest through the responsible development of renewable energy resources throughout the region, and our members include renewable energy developers and environment and consumer groups. We appreciate the opportunity to offer comments for consideration in the rulemaking to modernize the Council and Department's application process.

The minor statutory changes appear reasonable and we agree with the removal of hard copy paper submissions. We also agree with the proposed change under OAR 345-025-0006 to remove the restriction on beginning construction until all construction rights have been obtained on the entire site. Under the more substantive proposed rule changes, however, we are concerned about the potential burden that the new geospatial data requirement could create for applicants. As such, we'd like to provide the following comments.

OAR 345-001-0101: Information Submission Requirements

RNW is seeking further clarification on the geospatial data requirement under this proposed rule change. Our concerns center around the potential for additional burden on applicants to provide shapefiles, geodatabase files, or any other geospatial data. Applicants do not typically submit all of these shapefiles, and this requirement could result in requesting more data than necessary.

Furthermore, this geospatial data requirement says "where practicable," so we are seeking additional clarification on when this submission requirement may be triggered, as well as when the data collection process begins as it relates to this proposed rule change.

RNW additionally suggests the following to clarify this proposed rule change:

1. Make the geospatial data format requirements more specific:

- a. Include a data dictionary or required attributes for consistency (e.g., Date, Species Code).
 - b. Include the metadata requirements for each dataset submitted.
 - c. Provide a more specific list of datasets that are being requested (e.g., survey areas, nest points, special status observations).
2. Clarify whether confidential information should be included in this new data requirement and, if so, how that information should be provided to maintain confidentiality.
3. Specify what information is required under each data type, including “Biologic survey data,” and “Environmental impact and risk assessment data.”
 - a. Some data on figures are obtained from other sources, such as county parcel data or the Oregon Biodiversity Information Center. In these cases, the information provider would need to grant permission to transmit the data to ODOE because the licensing requirements may limit further distribution of data.
 - b. Clarify if “Biologic survey data” is limited to information that appears on figures.

Conclusion

In sum, RNW is pleased with EFSC’s efforts to modernize the application process and agrees with the minor statutory corrections, removal of hard copy paper submissions, and removal of construction rights requirements. However, we respectfully recommend clarifying the geospatial data submission requirement as this may create additional undue burden for applicants and reviewing staff. Providing more specific data requirements would help mitigate any additional burden by helping applicants prepare their data submissions early in the process.

Thank you for your consideration of these comments.

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