



State of Oregon Department of Environmental Quality

# Written Comments

Solar Noise 2024 Rulemaking Advisory Committee Meeting

This document is a compilation of written comments received during the public comment period for the Solar Noise 2024 Rulemaking, which closed on at 4 p.m. on June 21, 2024.

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June 21, 2024

TO: DEQ & EFSC Rulemaking Staff

FROM: Oregon Solar + Storage Industries Association

**RE: Comments on DEQ Solar Noise Rulemaking**

The Oregon Solar + Storage Industries Association (“OSSIA”) is a trade association founded in 1981 to promote clean, renewable, solar technologies. OSSIA provides a unified voice of the solar industry; OSSIA members include businesses, non-profit groups, and other solar industry stakeholders. OSSIA is a member of the Department of Environmental Quality Solar Noise Rulemaking Advisory Committee engaged in the review of Solar Noise Regulations (OAR 340-035-0035). We appreciate the opportunity to participate in the process and offer support for the rule changes put forward by DEQ and ODOE rulemaking staff.

*1. Assumed Ambient Noise Level for Wind and Solar Facilities, Subpart (iii)(I) and (II)*

The proposed rules mirror the changes made during the 2004 wind noise rulemaking in that now a solar facility, like a wind facility, may use “an assumed background L50 ambient noise level of 26dBA or the actual ambient background level” when performing a noise analysis. OSSIA is strongly supportive of this change as it affords solar the same treatment as wind, which will reduce the permitting burden by not requiring each solar facility to produce a noise study to determine the actual ambient noise. The rule also allows for flexibility for applicants who might seek to calculate their own projects noise level if they choose too and that is a good thing too in case circumstances warrant field measurements.

*2. Waiver, Subpart (iii)(III)*

The proposed rules also mirror the changes made during the 2004 wind noise rulemaking in that now solar, like wind, will be able to acquire waivers from affected homeowners if the proposed facility increases sound levels higher than 10dBA. OSSIA is supportive of this additional flexibility for solar projects, these rules have been in effect for wind projects for 20 years and have worked well. These waiver provisions allow for a new option other than mitigation for projects that might exceed the 10dBA threshold from the rules.

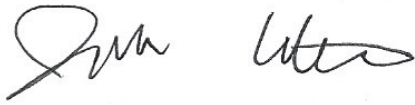
*Conclusion*

In conclusion, OSSIA is extremely supportive of the efforts to set a presumed ambient noise level for solar and allow solar to take advantage of waivers like wind.

Thank you for considering these comments.

Signed,

Oregon Solar + Storage Industries Association

A handwritten signature in black ink, appearing to read "Jack Watson". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

Jack Watson  
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Oregon Solar + Storage Industries Association  
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