



**MEMORANDUM IN OPPOSITION AS WRITTEN TO**  
**[S.6257-A \(Sanders\)](#) / [A.1903-A \(Glick\)](#)**  
**In Relation to the development of uniform standards**  
**for the coloring of wind turbine rotor blades**

February 2024

The Alliance for Clean Energy New York (ACE NY) opposes S.6257-A/A.1903-A as written. This bill would require the Office of Renewable Energy Siting to include in the standards and conditions for the operation of wind turbines, the coloring of wind turbine rotor blades to minimize bird collisions to the maximum extent practicable, without consideration of other equally important factors.

Although there have been media reports that painting turbine blades a dark color could protect birds, there is currently insufficient research on whether changing the color of wind turbines is an effective strategy for minimizing bird mortality. These articles have mentioned a study<sup>1</sup> from Norway that was published in 2020. This study was limited in scope; it looked at only 8 turbines and with dark paint on only 4. Even the study authors stated, “We must therefore be careful what we deduce from the experiment given the limited number of turbine pairs.” In their conclusion, the study authors recommend more study with more turbines included or conduct research at more sites. Further study is needed before we know if changes in wind turbine blade color can be an effective strategy. Moreover, there are a number of related technical and regulatory considerations that would also need to be addressed. Finally, new technological strategies are making wind farms safer for birds, and ongoing innovation will continue to identify new solutions to reduce bird mortality.

The Office of Renewable Energy Siting (ORES) current regulations on wind turbine blades require the blades to be white or off-white to be consistent with Federal Aviation Administration (FAA) requirements, and that non-reflective finishes be used to reduce glare. The FAA requires turbine blades to be painted white or light grey to increase visibility to aircraft<sup>2</sup>. And if additional visibility is needed, the turbine tower or mast may be painted aviation orange, but the blades must remain white or light grey. This bill must be amended so that ORES rules can be consistent with FAA or other federal regulations. ORES should also have the flexibility to balance bird protection with other issues, such as protection of historic resources, community preference, and aviation safety.

For the above reasons, the Alliance for Clean Energy New York opposes this legislation and urges it be amended. For more information contact Deb Peck Kelleher, Deputy Director, at (c) 518-698-3211. All of ACE NY’s memos on legislation are available at <https://www.aceny.org/legislative-actions>.

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<sup>1</sup> [Paint it Black: Efficacy of Increased Wind Turbine Rotor Blade Visibility to Reduce Avian Fatalities](#) by Roel May, Torgeir Nygard, Ulla Falkdalen, Jens Astrom, Oyvind Hamre, Bard G. Stokke, Ecology and Evolution, Volume 10, Issue 16, pages 8927-8935.

<sup>2</sup> [Obstruction Marking and Lighting](#), Advisory Circular AC 70/7460-AM, U.S. Department of Transportation Federal Aviation Administration, 11/16/2020, p. 51.