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To: Members of the House Energy and Environment Committee

From: Rhett Lawrence, Oregon Chapter Sierra Club

Date: May 21, 2015

RE: Senate Bill 752

Chair Vega Pederson and Members of the Committee: On behalf of the more than 20,000 members and supporters of the Sierra Club in Oregon, I am pleased to provide this written testimony in opposition to Senate Bill 752.

As an organization with a long history working to move beyond fossil fuels in Oregon, we support innovative ways to find clean energy and reduce carbon emissions, and we do not oppose biomass energy categorically. However, we strongly believe that SB 752's attempt to exempt biomass combustion facilities that emit carbon dioxide (CO₂) from state air quality rules intended to limit CO₂ emissions is deeply flawed.

Committee members may have seen in the record the November 2014 memo from Janet McCabe of the Environmental Protection Agency (EPA). That memo indicates an *expectation* that biomass would be exempt from carbon control requirements in the EPA's Clean Fuels Program. However, it bears noting that that was an interim report and it does not reflect a final decision. The EPA's program is still in rulemaking, so if nothing else, this bill is premature. But whatever EPA ends up establishing in its Clean Fuels Program, which is presently unknown, that should not be a driver for how Oregon treats biomass today.

Trees, of course, are a major source of biomass used as fuel. But wood is generally a poor choice of fuel for power production. Forests store carbon from the atmosphere, and when burned, all the carbon that has been sequestered is instantly released back into the atmosphere. By labeling biomass as carbon-neutral, this bill would amount to a policy that could promote logging to reduce carbon emissions.

However, even logging for biomass in younger forests can take decades to see something approaching carbon neutrality. This would essentially amount to a shell game if our goal is to reduce overall carbon emissions 10% below 1990 levels by 2020 and 75% below 1990 levels by 2050, which is Oregon's current target. Furthermore, such a policy would contradict a growing body of science, including peer-

reviewed studies in leading journals, showing that not only is biomass not carbon-neutral, it actually increases carbon emissions 50-100% more than burning coal.

Finally, no other state has adopted legislation similar to SB 752, and while Oregonians relish our trailblazer status, this is not the issue by which to set ourselves apart. Massachusetts, on the other hand, realized that its Renewable Portfolio Standard regulations were rewarding power companies for burning whole trees, thus undermining efforts to invest in truly low-carbon energy sources. The Commonwealth chose to end this practice by putting in place smart standards to drive the market towards the best sources of biomass – the first standards in the world to set a performance requirement for biomass. Oregon should also consider such proactive measures, instead of undermining our air quality and clean energy goals as this bill would do.

For these reasons, we oppose Senate Bill 752 and encourage members of this committee to do the same. Thank you very much for considering our comments and please do not hesitate to contact me if I can be of further assistance to the Committee.