



March 16, 2015

Senator Chris Edwards
Senate Committee on Environment and Natural Resources
c/o Beth Reiley, Committee Administrator
Re: Support for Senate Bill 752

Chair Edwards and members of the Committee,

Sustainable Northwest would like to offer our support for SB 752, to conditionally exempt from regulation under certain air pollution laws carbon dioxide emissions from combustion or decomposition of biomass.

Our position on this issue is informed by the extensive and rigorous scientific analysis performed by the Environmental Protection Agency to develop an appropriate quantification and regulatory framework for biogenic carbon dioxide emissions. To this effect, please see the attached agency memo from Janet McCabe, Acting Assistant Administrator at the Office of Air and Radiation at the EPA on the subject of "Addressing Biogenic Carbon Dioxide Emissions from Stationary Sources". This memo was released at the same time as the **Revised Framework for Assessing Biogenic CO₂ Emissions from Stationary Sources**, which was produced by the EPA and reviewed by a Science Advisory Board with stakeholder input over the course of more than four years.

As the memo states, the EPA "anticipates near-term decision-making pertaining to biogenic CO₂ emissions in the context of both the Clean Power Plan (CPP) and the Prevention of Significant Deterioration (PSD) program. As a result, we expect that many states and stakeholders will look to the second draft of the Framework for indications of how the Agency will treat biogenic CO₂ emissions under both the CPP and the PSD program going forward."

Furthermore, "When considering state compliance plans, the Agency expects to recognize the biogenic CO₂ emissions and climate policy benefits of waste-derived and certain forest-derived industrial byproduct feedstocks, based on the conclusions supported by a variety of technical studies, including the revised Framework. In addition, given the importance of sustainable land management in achieving the carbon reduction goals of the President's Climate Action Plan, the EPA expects that states' reliance specifically on sustainably-derived agricultural- and forest-derived feedstocks may also be an approvable element of their compliance plans. This approach is consistent with the EPA's recognition in the proposal that every state has different energy systems and available fuel mixes."

Sustainable Northwest recognizes that carbon accounting and regulation of biomass feedstocks is a complex task and requires careful analysis and review from the scientific community. The efforts of the EPA are the most comprehensive to date and representative of Federal opinion and administrative oversight on the matter. We believe that SB 752 is largely consistent with this framework and the opinions expressed by Ms. McCabe in the memo to the agency.

For these reasons, and to provide greater certainty to stakeholders and regulators in the State of Oregon, we support passage of SB 752 at this time.

Thank you for your consideration.

Sincerely,

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