



Marion County

OREGON

Board of Commissioners

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February 7, 2018

BOARD OF COMMISSIONERS

Janet Carlson
Kevin Cameron
Sam Brentano

Senator Michael Dembrow, Chair
Members of Senate Environment & Natural Resources
Representative Ken Helm, Chair
Members of House Energy & Environment

RE: Senate Bill 1507 and House Bill 4001

CHIEF ADMINISTRATIVE OFFICER

John Lattimer

Dear Chairs Dembrow and Helm, and Members of the Committees:

Marion County is committed to stewardship and sustainability and our county has many programs that reduce carbon. Marion County has long recognized the GHG reductions that can occur in the waste sector. Specifically, by processing the waste generated in the county at the Marion County Energy-from-Waste (EfW) facility, the county has reduced GHG for more than 30 years.

The facility combusts municipal solid waste while generating approximately 13 megawatts of electricity (enough to power a city the size of Woodburn) that is sold to Portland General Electric, reducing the volume of material to be disposed by 90%. The funds derived from this sale help to fund the county's integrated solid waste management program. This program includes extensive waste reduction, reuse, recycling, and composting programs, which have enabled Marion County to consistently have one of the highest recovery rates in the state.

We are concerned that Senate Bill 1507 and House Bill 4001 exclude landfills from the cap and trade program, but include the Marion EfW facility. The bill in its current form does not create a level playing field within the waste sector: the Marion facility would have to secure allowances while landfills face no obligation for their emissions. These allowances will require the use of county revenues and increased consumer rates, thereby putting additional pressure on our existing solid waste management system at a time when we face increasing challenges in recycling markets.

EfW facilities are internationally recognized as a source of greenhouse gas mitigation and as a result they are exempted from other cap and trade programs in the Regional Greenhouse Gas Initiative (RGGI) in the Northeastern United States, the European Union Emissions Trading Scheme and the Ontario cap and trade program. In California, EfW has received full allowances in the cap and trade program since the beginning of the program and it is expected that this treatment will continue.

Additionally, these facilities are recognized as a GHG mitigation technology by the United States Environmental Protection Agency (U.S. EPA), U.S. EPA scientists, the Intergovernmental Panel on Climate Change (“IPCC”), the World Economic Forum, the European Union, the California Air Resources Board (CARB) and CalRecycle. This GHG mitigation is achieved by displacing grid connected fossil-fuel fired electricity, recovering metals from the waste stream for recycling, and most importantly, by avoiding landfill emissions of methane, a significant Short-Lived Climate Pollutant.

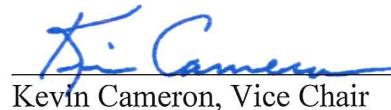
Marion County requests that the EfW facility be excluded from the cap and trade program following the lead of many other jurisdictions around the world that have concluded that sustainable waste management — incorporating recycling, composting and for what remains, EfW — can play an important role in reducing greenhouse gas emissions.

Thank you for your consideration.

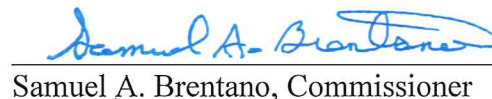
Sincerely,



Janet Carlson, Chair



Kevin Cameron, Vice Chair



Samuel A. Brentano, Commissioner