



February 22, 2018

## **Opposition to HB 4001 Dash-12 Amendment**

House Committee on Rules

Madam Chair and Members of the Committee:

The Pacific Propane Gas Association urges you not to adopt the Dash-12 amendment to HB 4001 (Cap & Invest). It establishes a new limit on greenhouse gas in Oregon, and says that if a cap and invest program is not passed by the 2019 legislature, DEQ is authorized to go ahead and establish a program.

Our propane marketer counterparts in California do not like their state's cap and trade program, and the thing they like least is that the legislature gave too much leeway to their state agency to implement such a program.

Oregon DEQ is already struggling with its workload. This is from a recent audit:

<https://olis.leg.state.or.us/liz/2018R1/Downloads/CommitteeMeetingDocument/143006>

The Oregon Secretary of State audit of DEQ says:

"The Oregon Department of Environmental Quality has a significant backlog in air quality permit renewals. We found that:

"1. 43% (106 out of 246) of DEQ's largest and most complex federal and state air quality permit renewals are overdue for renewal. Additionally, more than 40% of the most complex permits issued from 2007 to 2017 exceeded timeframes established by DEQ or the Clean Air Act, some by several years.

"2. DEQ struggles to issue timely permits and renewals due to a variety of factors, including competing priorities, vacancies, and position cuts that have created unmanageable workloads. Other factors include inconsistent support and guidance for staff; a lack of clear, accessible guidance for applicants; and increased time for the public engagement process.

"3. Untimely permits, combined with a current backlog of inspections, endanger the state's air quality and the health of Oregonians."

We believe adding to DEQ's workload the challenge of designing and implementing such a giant program as Cap and Invest without legislative guidance would not be wise. Let the legislature make the decisions and take the responsibility for the program's success or failure.

Thank you for your consideration.

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