



To: House Committee on Climate, Energy and the Environment  
From: 350PDX Forest Defense Team  
Date: February, 10 2025  
Re: HB 2332, Air curtain Incinerator Deregulation - OPPOSING

350PDX is a volunteer-based organization that advocates for climate justice for all Oregonians. I am writing on behalf of its Forest Defense team to urge you to oppose HB 2332, which would curtail DEQ oversight of air curtain incinerators thus increasing public health risks.

Those who track the Air Quality Index (AQI) know that air quality continues to deteriorate in our communities. This is reflected in the ever-increasing numbers of people dependent upon inhalers, nebulizers, and other medications. As climate change continues to make wildfires more frequent, air quality is becoming a more pressing public health concern. Overseeing the effectiveness of air curtain incinerators is vital to reduce air pollution from burning woody material.

Air curtain incinerators remove some dangerous particulates during the burning of wood waste. However, they are not a magic solution to the air pollution created by burning woody material and other vegetation. No air curtain incinerator removes all particulate matter and other pollution from emissions all the time. They vary according to design, manufacturer, operator skill, stage of the burning operation, and characteristics of the material being burned.

Moreover, in addition to increasing dangerous airborne particulate matter, any system that burns woody biomass and other plant material adds carbon dioxide to the atmosphere. This exacerbates climate change, which extends the fire season, which contributes to *more* particulate matter in the air.

Woody material and other vegetation should be retained in the soil carbon cycle and not dumped in the atmosphere by burning. Many communities in rural parts of the Pacific Northwest provide mobile wood chippers. These are loaned free-of-charge for processing of post-logging slash. Subsidizing similar programs would be a far better use of public and private resources than air curtain incinerators or other systems that burn unwanted material. Oversight by DEQ should continue for all incinerators.

Thank you,

Brenna Bell, Forest Climate Manager  
350PDX