



Associated Oregon Loggers, Inc.

PO Box 12339 • Salem, Oregon 97309 • Phone (503) 364-1330 • Fax (503) 364-0836

March 23, 2023

The Honorable Janeen Sollman, Chair
Senate Committee on Energy and Environment
Oregon State Capitol
Salem, OR 97301

Subject: SB 525 – **Oppose**

Chair Sollman, Vice Chair Findley and Committee Members:

Associated Oregon Loggers (AOL) is Oregon's forest operator trade association which represents nearly 1000 small contracting businesses. Our members have been involved in the management of Oregon's forests for generations and provide their local communities with economic stability, Oregon with healthy and vigorously growing forests and the nation with renewable building materials. Thank you for the opportunity to share with you the voice of nearly 22,000 hard working Oregonians who depend on their small engine tools every day to achieve their work outputs in a safe and reliable way.

AOL is opposed to SB 525 for many reasons.

Our association cares deeply about the environment and participates on many committees, councils and boards to advocate for a cleaner and less carbon intensive future for Oregon. Thankfully, Oregon's working forests are a major part of our solution to societies greatest challenges. Oregon is a well-established leader in modern forestry, and that's something all Oregonians should be proud of. Managed forests scrub our air of pollution and purify our drinking water. One recent study found that actively-managed forests store more carbon than unmanaged forests, in trees and soil, even when those forests have been harvested multiple times.

Wood is produced by trees in a forest, using free energy from the sun, carbon dioxide from the air, plus water and nutrients from the soil. Healthy managed forests generate far more pure oxygen, returned to the atmosphere, than do old slow growing forests. Wood is beautiful, strong, natural, renewable, recyclable, energy efficient, easy-to-use wood. No other resource on earth can match its environmental advantages.

Every day our local wood manufacturing businesses manage for and make products that capture and store CO2. There is a growing movement to construct more, and larger, wooden buildings in the world's largest cities because elected officials, urban planners, architects, conservation organizations and others are recognizing the environmental potential of this resource.

Regrettably, SB 525 would make the, already capital intensive, work of AOL's member companies that much more expensive and the reality is zero-emission small nonroad equipment for our sector to use in commercial applications does not exist.

Of critical note are **firefighting water pumps, cable yarding carriages, industrial chainsaws and a whole suite of restoration equipment** (industrial pole saws, brush cutters and more). These are all vitally important pieces of small nonroad equipment for the forest operator community that are, currently, technologically infeasible to be made into zero-emission replacements or cannot be created with similar functionality and capacity resulting in decreased production, increased down time and reduced margins for the small businesses of Oregon.

We appreciate the bill language outlining the type of considerations the Environmental Quality Commission must take prior to adopting rule, but believe if this bill is to do anything it should ONLY be a study to determine those items outlined in Section 2 (3) (a)-(e). We also believe many additional types of small nonroad equipment and sectors who use such equipment that must be included and called out in a study for it to be comprehensive.

Additionally, we believe the Environmental Quality Commission would need to investigate the additional emissions for the manufacturing of new battery packs, the mining of the necessary rare earth minerals and the issues around disposal for battery packs.

Even if the technology was available to simply substitute zero-emission small nonroad equipment in place of our other liquid fuel consuming equipment there are still major problems due to the location of our jobsites and the environment our members work in. Because our members work in the woods, far away from any power grid, added complexities for charging would also exist for our sector which would require even greater capitol expenditures for excessive numbers of battery packs, the use of generators for power consumption or leakage would occur with the use of vehicle motors to power or charge equipment instead.

Additional leakage may occur from businesses buying equipment from neighboring states, disenfranchising the small business dealers and retailers who sell such equipment in our borders which would economically disadvantage Oregon businesses as compared to neighboring states.

For those sectors with ready to use and equivalent replacement products and zero-emission small nonroad equipment, the incentive program outlined in the bill may be enough to start a transition, but any mandate that is more or less unfunded is unjust for the small businesses and working-class citizens of Oregon, many of which have thin margins yet work to employ historically underrepresented populations in the state.

In the end, we believe small nonroad equipment makes up a negligible quantity of Oregon's emissions and a regulation like the one laid out in SB 525 would do much more harm to the state than good.

Thank you for the opportunity to testify on our views of SB 525.

Graciously,

A handwritten signature in black ink, appearing to be 'Amanda Sullivan-Astor', written over a horizontal line.

Amanda Sullivan-Astor (she/her/hers)
AOL, Forest Policy Manager
Email: aastor@oregonloggers.org