



April 24, 2007

Dr. Robert F. Sawyer  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

RE: Formaldehyde-Free Wood Products Regulation

Dear Dr. Sawyer:

The Coalition for Clean Air and the American Lung Association of California support the California Air Resources Board's (CARB) plan to require the wood products industry to develop formaldehyde free and low formaldehyde products. We support the stringency of the standards and the "cap approach" proposed by staff but we strongly believe the industry can and should meet these standards sooner. We urge the Board to strengthen staff's proposal by accelerating the implementation timeline so that the regulation is fully phased in by January 2010. At a minimum the Board should accelerate the portion of the regulation that covers hardwood plywood – veneer core and hardwood plywood – composite core.

California has identified formaldehyde as a toxic air contaminant. In 2004 the International Agency for Research on Cancer concluded that formaldehyde causes cancer. As the staff report indicates there is no safe threshold exposure level for formaldehyde.

During the last 30 years wood product manufacturers have developed many formaldehyde free and low formaldehyde products. As a result there are practical and affordable alternatives to formaldehyde-based resins in the market today. For example, Roseburg Forest Products have products in the market for both particleboard and hardwood plywood and another company, Sierra Pine, has products for medium density fiberboard (MDF) available now. While both of these companies testified in the CARB workshops about the challenge of meeting low-emitting standards, both are currently advertising their own "CARB-compliant" products.

Additionally, Columbia Forest Products, the leading supplier of formaldehyde-free products for the hardwood plywood veneer market, has offered to license its technology at reasonable cost to any other supplier.

The bottom line is that various private sector wood product firms are currently capable of – or already producing and marketing – formaldehyde-free products. In the best interests of California, formaldehyde-free products should no longer be a small, niche market; these building materials should be made widely available.

Again, we appreciate CARB's work in developing this regulation. To better protect public health we urge an acceleration of the requirements proposed by your staff.

Sincerely,

Tim Carmichael  
Coalition for Clean Air

Bonnie Holmes-Gen  
American Lung Association of California