

**COLUMBIA FOREST PRODUCTS SUPPORTS PROPOSED CARB RULE
TO PROTECT CALIFORNIA AIR FROM KNOWN CARCINOGEN AND
GUIDE TRANSITION OF COMPOSITE WOOD INDUSTRY USING
AVAILABLE, PROVEN TECHNOLOGY**

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As the California Air Resources Board considers adopting an ATCM to greatly reduce formaldehyde emissions from composite wood products, the CARB Staff Report presents overwhelming evidence that the proposed ATCM can achieve meaningful health and environmental benefits, with proven and readily-available technology.

Columbia Forest Products applauds the work of the CARB staff and supports the main thrust of the proposed ATCM. However, our experience as a leader in the hardwood plywood market in North America [supplying over 40% of the market] leads us to conclude that CARB can be more aggressive in its standards and implementation timeline -- requiring our industry to transition to low and no-formaldehyde resin innovations swiftly in order to achieve the desired benefits as soon as possible.

In the attached materials we suggest preferred emission standards and an accelerated implementation schedule for hardwood plywood. With modest modifications to the standards and timeline in the Staff Report, you can achieve your air quality mission with a rule that is affordable, achievable and market-competitive.

The charts and materials which follow are offered into the public record to support the key elements of our position on the proposed ATCM:

- Urea formaldehyde is a dangerous, toxic air contaminant. There is no safe threshold for exposure to this known carcinogen. Industry claims that there are no ill health effects from exposure to urea formaldehyde are not to be taken seriously.
- California is already at risk of becoming a toxic dumping ground for high-fuming, formaldehyde-based composite wood panels that cannot be sold into other global markets. And it will only get worse without the strong standards and enforcement. While Europe and Japan have established

strict standards for regulating formaldehyde emissions to very low or “background” levels, the U.S. has no equivalent regulations. In the past three years, off-shore suppliers have ramped up their production to dominate the domestic hardwood plywood market with serious health implications: industry data shows more than one million panels per month enter California ports from China, alone, with some of these products registering “off-the-chart” levels of formaldehyde emissions.

- Numerous alternative resins exist today to satisfy the demand for low or no-formaldehyde emitting composite wood products. The emergence of the “green building” market and progressive government procurement practices help shape this dynamic. Products made with these low or no-formaldehyde resins perform at a high level in the real world. Industry claims that these alternatives, which meet the CARB rule, are not readily available are not to be believed.
- The cost impact to end users and consumers from transition to “CARB-compliant” products is negligible, as demonstrated in Appendix E of the Staff Report and in various other places throughout the report materials. As our real-world examples of kitchen-remodeling costs show [additional costs to an average kitchen would be \$40.35], industry claims of 40-50% up-charges are completely unfounded.
- Time is of the essence. Because numerous alternatives are readily available in the market today, establishing “background” emission standards for hardwood plywood is achievable and implementation timelines for the hardwood plywood regulation in “Phase II” should be accelerated. Critics of the implementation timelines as “too swift” should be ignored – California’s intention to rid the air of formaldehyde toxic air contaminants has been the “handwriting on the wall” since 1992.

Columbia Forest Products appreciates the opportunity to participate in this historic rule-making and respectfully urges the California Air Resources Board to take bold steps that will improve human health and the environment, enhance the competitive position of the domestic composite wood products industry and help position California for future leadership in the emerging green building economy.