

My name is Joan Cassman. I am a partner with the law firm of Hanson Bridgett Marcus Vlahos & Rudy representing Columbia Forest Products. Ed Howard of Howard Advocacy is a member of our legal team.

We have carefully reviewed the staff report and applaud the manner in which the CARB staff has ably and comprehensively addressed the applicable legal as well as the policy issues for this ATCM. We have submitted for the record a letter brief that reinforces the staff's legal findings and demonstrates how the salient facts in the record support these findings.

In short, the statutory authority for the Board to adopt the proposed regulations is clear and unequivocal. Indeed, we are convinced that the Tanner Act directs and requires this Board to adopt the recommendation before it or adopt even more stringent regulations, given the factual predicates in the record.

Thank you for this opportunity to comment.