

**Boise Cascade Wood Products, LLC**  
3285 North Pacific Highway  
PO Box 100  
Medford, OR 97501  
P 541 776 6666 F 541 776 6618



February 22, 2019

Joint Committee on Carbon Reduction  
Oregon State Capitol  
900 Court Street NE, Room 347  
Salem, OR 97301

**Subject:** Testimony to Cap and Trade Draft Policy

The wood products we manufacture are in demand for building American homes and businesses. Wood is the only naturally renewable building material, and the only building material that sequesters carbon.

- Boise Cascade's Oregon facilities compete nationally and internationally as well as within the state. We support Greenhouse Gas Reduction polices that do not competitively disadvantage Oregon business and industry.
- Cap and Trade legislation in Oregon should support the production and use of wood building products to sequester carbon.
- Active forest management on private, state and federal forest lands will:  
Reduce wildfires that produce large amounts of greenhouse gases without any benefit of energy production or sequestration in products.  
Produce a renewable, sustainable timber supply that allows us to invest in our communities.
- Fuel and electricity required for operation of pollution control devices required by local, state, or federal regulations, such as regenerative thermal oxidizers (RTOs) should be excluded from the baseline and threshold calculations and excluded from the GHG reduction requirements. Any fuel switching (such as biomass to natural gas) to comply with any local, state, or federal regulations should also be excluded from the baseline and threshold calculations and excluded from the GHG reduction requirements.
- Only regulated entities should be allowed to purchase GHG offsets. This program should not be an investment opportunity for those whose only interest is investment profit except as they may desire to invest to create offsets. Nor should non-regulated entities be allowed to purchase and retire offsets.
- Maintain the 25,000 tonnes CO<sub>2</sub>e threshold, but apply it per facility, not aggregated for the company.

Thank you.



John White  
Region Manager