

*Robert J. Glover*  
*3285 North Pacific Highway*  
*Medford, OR 97501*

April 12, 2021

Natural Resource Subcommittee of Ways and Means:

For the record I am Robert (R. J.) Glover, the Western Oregon Region Manager for Boise Cascade Wood Products, a manufacturing company with five mills in Oregon that provide family wage jobs to approximately 950 Oregonians. Our industry is heavily regulated by DEQ. We work hard to comply with environmental regulations. We try to foster good working relationships with DEQ staff. We are active in DEQ's regulatory development program. We depend on DEQ to provide environmental permits in a timely manner, and we support appropriate funding for DEQ. We seldom, if ever, oppose requested fee increases, even when those increases seem extreme and support programs we consider to have very little environmental benefit.

However, we have concerns with some of Oregon DEQ's policy development and implementation work for state-only and federally delegated regulatory programs. Specifically, we are concerned with the recently issued 1200-Z industrial stormwater permit and even more concerned with DEQ's implementation of the federal Regional Haze program. The intent of the Regional Haze program is to reduce visibility impairment in national parks and wilderness areas. DEQ appears to be using this federal program to force emission reductions at manufacturing facilities such as ours, that will have significant costs without providing any demonstrable benefit in visibility in these areas. DEQ is calculating an acceptable cost based on \$/ton of emissions reduced rather than \$/visibility improvement. For example, DEQ has concluded that an annual cost of approximately \$5,000/ton of emissions reduction at one of our mills is acceptable. However, they provide no evidence such emission reductions will improve visibility. Based on our assessment, these costs translate to approximately \$3 to \$7 million dollars annually per deciview improvement on the very worst visibility day of the year. The annual costs are much higher on days when visibility is less impaired. Furthermore, the controls they seek require the use of natural gas and actually add additional greenhouse gas emissions.

We are not seeking to defund any DEQ regulatory program. We only seek to inform this Subcommittee of our concerns regarding implementation of these regulatory programs and others described in testimony by the Northwest Pulp and Paper Association, of which we are a member. We ask this Subcommittee to consider our concerns and ensure that DEQ is not inappropriately using federal regulatory programs as a means to achieve other desired goals and to ensure DEQ's regulatory programs appropriately consider the true cost and benefits.

Thank you for the opportunity to testify.