



March 12, 2025

The Honorable Kathleen Taylor
Chair, Senate Committee on Labor and Business
900 Court St. NE, Room 453
Salem, OR 97301

RE: Senate Bill 1061, *A Bill for An Act Relating to a lumber grading training program*

Dear Chair Taylor, Vice-Chair Bonham and distinguished members of the committee:

The American Wood Council (AWC) appreciates the opportunity to provide the following comments of concern in response to Senate Bill 1061, *A Bill for An Act Relating to lumber grading training program*.

AWC is the leading voice for wood products manufacturing, an industry that provides over 460,000 men and women in the United States with family-wage jobs. AWC represents 87 percent of the structural wood products industry, and our members make products that are essential to everyday life that are derived from a renewable resource that absorbs and sequesters carbon for many decades. Our staff experts develop state-of-the-art engineering data, technology, and standards for wood products to ensure their safe and efficient design, as well as provide information on wood design, green building, and environmental regulations.

The performance of wood buildings, especially when subject to the forces of natural disasters, such as high wind or snow, is dependent on lumber that is properly marked and graded for strength. Graded lumber is lumber that conforms to the U.S. Department of Commerce's PS 20 standard. Maintained by the American Lumber Standard Committee (ALSC), a nonprofit comprised of lumber manufacturers, distributors, users, and consumers, PS 20 establishes criteria to provide for industry-wide standard sizes, and grade mark labeling of lumber by mills using the services of an accredited agency. ALSC's thorough inspection and grade marking programs ensure that when a consumer buys graded lumber, or a code official inspects lumber for compliance with building code requirements, they can be confident in not just the size and species of the product, but importantly, the corresponding design properties.

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Current provisions of the Oregon Building Code, taken from the *International Building Code* (IBC) and *International Residential Code* (IRC), require that lumber stamped with a grade marking conforms to the PS 20 standard. The lumber grading rules in this standard ensure consistent and reliable stress values on which the engineering and construction industries rely.

AWC has concerns that S.B. 1061, if not implemented properly, weakens Oregon's building code requirements for the safe use of lumber in structural applications. We are particularly concerned about the bill's requirements for the approval of lumber by individuals holding a lumber grading certificate issued under the newly formed training program, as well as the individual exemption from the program under Section 1, subsection 3. Regarding the newly formed training program, we note that program requirements are not prescribed and may lack thoroughness when compared to the lumber grade mark system required by the building code.

Specifically, this bill does not require that the certification of graders under the new program ensures conformance of grade-marked lumber to the DOC PS 20 American Softwood Lumber Standard referenced in the Oregon building code. Without equivalent criteria, this bill could unintentionally lead to weakening of building codes adopted in the State.

The DOC PS 20 American Softwood Lumber Standard for grade marking of lumber that meets building code requirements include:

- a) required regular third-party oversight of the grading skills of the lumber grader for ensuring ongoing competency of grade marking,
- b) use of recognized ALSC accredited agency grade rules for marking lumber grade directly on lumber,
- c) a method for approving and/or recording of grade marks, to differentiate lumber based on structural quality, and
- d) a method for communicating the meaning of grade marks to local code officials, design professionals, and consumers and ensuring such grade marks do not create confusion for proper use.

In order to meet Oregon's own code requirements, any new lumber grading training program established by this bill would have to ensure this same rigor. To achieve equivalency between S.B. 1061 requirements and building code requirements for marked lumber, an expanded role for Oregon State University (OSU), or others, is necessary to ensure that OSU's program conforms with the DOC PS 20 standard; that ongoing competency of certified graders is regularly evaluated; that marks used by certified graders are approved, recorded, and readily available to address code official and consumer inquiries about viability of



the marked lumber; and that a method is available to address disputes about lumber marked by an OSU certified grader.

We respectfully encourage that any further activity concerning grade-marked lumber that is alternative to minimum building code requirements closely involve the building code official community, including the Oregon Building Codes Division and Oregon Building Officials Association.

We appreciate the opportunity to provide comment on this legislation. If you have any questions, please feel free to contact me at the number below. Thank you for your consideration.

Sincerely,

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