

(sent via email to sen.kathleentaylor@oregonlegislature.gov)

March 7, 2025

Honorable Kathleen Taylor
State Capitol
900 Court St. NE, S-209
Salem, Oregon 97301

Re: Opposition to SB 1061: Relating to lumber grading training program

Dear Chair Taylor and members of the Senate Committee on Labor and Business,

The Western Wood Preservers Institute (WWPI), Treated Wood Council (TWC), National Hardwood Lumber Association (NHLA), Pacific Lumber Inspection Bureau (PLIB), and North American Deck & Railing Association (NADRA) are writing to express our strong opposition to SB 1061, which establishes a lumber grading training program at Oregon State University's College of Forestry. SB 1061 is scheduled for consideration in your Committee on March 13, and we ask you to

add our opposition as part of any public testimony. We are concerned that SB 1061 would cause unforeseen health and safety issues.

SB 1061 would circumvent the national accreditation process administered by the American Lumber Standard Committee and the National Hardwood Lumber Association. While SB 1061 is intended to help the timber industry grade lumber, we don't understand the problem it seeks to solve. Transient inspection services offered by an accredited lumber inspection agency will increase the amount of lumber that is graded. Transient inspection service is ideal for portable sawmill operators and meets building codes and standards.

Lumber grade stamps ensure that lumber used in construction is of the required quality, and confirms that it can safely support the loads it is intended to carry. Lumber produced and grade stamped by a mill under the supervision of an ALSC accredited agency is regularly monitored to verify that it meets United States standards for lumber sizes, moisture content, and grade characteristics set forth in Voluntary Product Standard PS20, the National Grading Rule, and regional grade rules. These rules and standards are developed to ensure uniformity in establishing structural design values and structural integrity of the lumber. The lumber that would be "graded" under this program would not be subject to the rigorous accredited agency inspection requirements. To bypass Oregon building code, the bill requires the Department of Consumer and Business Services to design and provide forms that certify lumber has been "graded." However, there are no safeguards to ensure the form will be used for the lumber that was "graded." Additionally, there are no requirements for regularly verifying that standards are being met. This will create excessive liability issues for future building owners, insurance companies, and mortgage lenders, none of which will have the knowledge that the lumber "graded" and used in the structure do not meet national building codes and standards.

Residential decks and patios are built with preserved wood. Preserving wood will protect these structures from insect or microorganism decay. Wood preserving companies only treat lumber that has been grade-stamped by nationally accredited agencies. We are strongly opposed to self-grading, as allowed by SB 1061. Finally, we support the comments submitted by the American Lumber Standard Committee submitted on February 26th.

Thank you for giving us the opportunity to share our strong opposition to SB 1061. Please contact our Director of Government Relations, Ryan Pessah at ryan@wwpi.org or (619) 889-1666 to discuss our opposition more detail or if you have any questions.

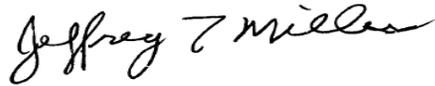
Respectfully Submitted,



Butch Bernhardt
Executive Director
Western Wood Preservers Institute

Founded in Oregon in 1947, WWPI is a non-profit trade association that has represented the interests of the preserved wood products industry in 17 western states. Our members produce the preserved wood products that are critical and essential to Oregon's infrastructure and enables the greening of the U.S.

economy. WWPI is a resource that works with federal, state, and local agencies, as well as designers, contractors, and users over the entire preserved wood life cycle.



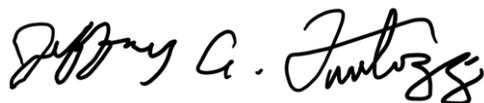
Jeffrey T. Miller
President & Executive Director
Treated Wood Council

TWC is an international trade association, serving the treated wood industry with more than 560 member organizations, including those with offices and/or operations in Bernalillo and Raton.



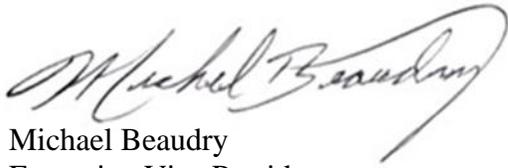
Dallin Brooks
Executive Director
National Hardwood Lumber Association

NHLA is the leading international trade association representing the hardwood industry. Established in 1898, NHLA is committed to providing its members with the resources to drive business, market share, and industry visibility. From standards and guidelines to lobbying efforts, marketing services, and more, NHLA strives for new heights of collaborative excellence. We are the premier North American hardwood trade association, the founder, keeper, and educator of the NHLA Hardwood Lumber Grading Rules, and the hardwood industry's unified voice.



Jeff Fantozzi
President
Pacific Lumber Inspection Bureau

Founded in 1903, Pacific Lumber Inspection Bureau (PLIB) is a non-profit, accredited lumber and wood products inspection and certification agency headquartered in Federal Way, Washington. PLIB provides lumber grade certification and grade-stamping services to the lumber industry along with a wide range of other inspection and certification services for related wood-products manufacturers throughout the Western US, Canada, and Europe. PLIB's Grade Stamp Licensing Agreement program authorizes qualified mill personnel to apply the PLIB registered grade marks and issue Certificates of Inspection. In addition to providing lumber grading and inspection services to member mills and subscribers on an ongoing basis, PLIB also offers services for those who need an inspection, quality marking, or certification service on a one-time or infrequent basis. This as-needed inspection service, also known as *transient* inspection service, is typically used by portable sawmill operators, fixed location mills who saw structural softwood lumber on an infrequent basis, small woodlot owners who use their own lumber for construction projects that require building code approval, and others. The PLIB registered grade marks and inspection certificates are recognized worldwide as evidence of quality.



Michael Beaudry
Executive Vice President
North American Deck & Railing Association

To advance industry interests in the code development arena, NADRA promotes member involvement as an industry voice for governmental agencies to rely on. NADRA creates and maintains relationships with associations, government agencies and code officials; to be a forum for the discussion, study, and investigation of proposed and existing model code development, as well as federal and state legislation.

cc: Members of the Senate Committee on Labor and Business:

Vice Chair Daniel Bonham (Sen.DanielBonham@oregonlegislature.gov), Senator Cedric Hayden (sen.cedrichayden@oregonlegislature.gov), Senator Khanh Pham (Sen.KhanhPham@oregonlegislature.gov), and Senator Aaron Woods (sen.aaronwoods@oregonlegislature.gov).