

American Lumber Standard Committee, Incorporated®

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VIA E-MAIL AND USPS

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Honorable Representative Robert Harb, Chair
House Resources, Recreation, and Development
Granite Place Room 228
1 Granite Place
Concord, NH 03301
Robert.Harb@gc.nh.gov

Subj: Comments on NH H.B. 1204

Dear Chairman Harb:

The American Lumber Standard Committee (“ALSC”) submits the following comments in response to the introduction of New Hampshire H.B. 1204, titled “An act relative to the grading and use of timber grown in New Hampshire.”

ALSC is the nonprofit accreditation body responsible for accrediting softwood lumber agencies across the United States, overseeing the U.S. system for regulating identification and grading of structural lumber. The hallmark of the program is the United States Department of Commerce American Softwood Lumber Standard (Voluntary Product Standard 20), which establishes a system for assigning, confirming, and monitoring design values to softwood lumber based on species, grade, and other characteristics. Building codes throughout the United States reference the ALSC system for construction utilizing softwood lumber. ALSC has significant concerns about how H.B. 1204 suggests that visually grade marked SPF and visually grade marked SPF(S) lumber are interchangeable. They are not.

Equivalence—The language of this bill implies a false level of equivalence for ALSC-accredited SPF grade marked lumber from Canada with visually grade marked SPF(S) lumber produced in the U.S. above 44 degrees North latitude. Section 1 states that “softwood timber harvested in New Hampshire at or above 44 degrees North latitude “shall be eligible for classification and grading as spruce-pine-fir (SPF), provided that: I. The timber is of species customarily included in SPF grouping under the American Softwood Lumber Standard (PS 20); and II. The timber meets all applicable structural and visual grading requirements for SPF as established by a recognized grading agency accredited by the American Lumber Standard Committee.” This is not how the ALSC system works. SPF(S) is a global number established for all the U.S. and covers all states that produce SPF(S). We do not separate smaller regions for different design values without there being test data to confirm that this is true. New Hampshire’s creation of an exception for a small subset of its state is a dangerous first step toward replacing a time-trusted and well understood interstate system with a confusing patchwork of values throughout the U.S. As noted below, if the intent of this legislation is to facilitate use of New Hampshire-produced lumber, there are other less-drastring means of achieving such an end.

SPF and SPF(S) groupings and design values are different—The vast majority of wooden structures built in the state that refers to and relies on the design values developed by the American Lumber Standard system and implemented by ALSC. The species mixes allowed and the resulting design values for the groupings of SPF and SPF(S) are different. SPF allows, **Alpine Fir, Englemann Spruce**, Black Spruce, Red Spruce, White Spruce, **Lodgepole Pine**, Jack Pine, and Balsam Fir while SPF(S) allows Black Spruce, **Norway Spruce**, Red Spruce, White Spruce, **Red Pine**, Jack Pine, Balsam Fir. The SPF design values for the broad geographic region of Canada after destructive testing were found to be higher in most grade cells properties than the SPF(S) design values for the broad geographic region of the upper U.S. The distinction between SPF and SPF(S) is due to a significant difference in properties that has been established by sampling and destructively testing material in the grade and species groupings defined above to establish representative design values for the visually graded commodity product. The legislation by its terms would create an exception only for species grown in a certain New Hampshire region that are “customarily included in the SPF grouping,” effectively attempting to circumvent and overrule a national standard that has been applied for decades. The very likely practical result of this legislation will be confusion among builders, building code officials, safety inspectors, architects, and engineers who have familiarity with the existing standard and the differences between the two groupings.

There is another way to get values of New Hampshire lumber to have SPF values—There is ample flexibility in the current ALSC-accredited agency grade-marking system to accommodate all lumber producers, including New Hampshire sawmills, that wish to produce lumber that would have design values competitive with the visually grade marked SPF design values being assigned to Canadian lumber by using mechanically graded lumber (MGL) techniques to produce MSR or MEL lumber. Producers can achieve a higher density designation for New Hampshire grown lumber through quality control under our current MGL system.

In summary, ALSC, recommends that the Resources, Recreation, and Development Committee reject the language of H.B. 1204 in its current form. We are willing to work with the authors to adjust the language to help New Hampshire lumber producers to produce lumber with design values similar to SPF in a way that does not risk jeopardizing the effectiveness and existence of an established program that has ensured the safe and effective use of softwood lumber in construction for decades.

ALSC will gladly provide additional information concerning the PS 20 system to you.

Sincerely,



David E. Kretschmann
President

cc: Representative Ron Dunn (Ron.Dunn@gc.nh.gov),
Representative Brian Taylor (Brian.Taylor@gc.nh.gov)
ALSC Officers
Counsel