



April 1, 2025

VIA ELECTRONIC SUBMISSION ON REGULATIONS.GOV

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The Honorable Eric Longnecker
Deputy Assistant Secretary for Technology Security
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

**RE: Request for Extension of Time to Submit Comments on Section 232
National Security Investigation of Timber and Lumber Imports and
Abbreviated Comments**

Dear Deputy Assistant Secretary Longnecker:

On behalf of the National Lumber and Building Material Dealers Association (NLBMDA), we respectfully submit the following comments in response to the U.S. Department of Commerce's (the "Department") Section 232 investigation of timber and lumber imports. The current deadline for comments is Tuesday, April 1st, 2025. NLBMDA respectfully requests that the Department consider extending this deadline through April 30th, 2025. This extension would provide our industry with the sufficient time needed to fully illustrate the perspectives of the lumber and building materials (LBM) industry in greater detail.

In the event our request is not granted, please note for your consideration our abbreviated comments on the matter below.

Respectfully submitted,

Jonathan M. Paine, CAE
President & CEO
National Lumber and Building Material Dealers Association

April 1, 2025

Abbreviated Comments Submitted by the National Lumber and Building Material Dealers Association (NLBMDA) on Section 232 National Security Investigation of Imports of Timber and Lumber.

NLBMDA, with its state and regional association partners represent over 6,000 building material retail locations nationwide who operate single and multiple lumber yards and component plants serving homebuilders, subcontractors, general contractors, and consumers in the new construction, repair and remodeling of residential and light commercial structures. The majority of NLBMDA members are small, family-owned lumber and building material (LBM) operations, in many instances providing lumber products and building materials in the same communities for generations.

According to the U.S. International Trade Commission, Canada accounted for 83.2 percent of all U.S. lumber imports. Because of this, our abbreviated comments will focus specifically on the U.S.-Canadian lumber industry which has been deeply integrated for decades. Canadian lumber and its derivative products, including engineered wood products, play a key role in meeting the growing demand for new housing and renovation projects. The quality and affordability of these materials have been integral in pursuing our industry's goal of addressing the affordable housing crisis, an issue that this administration rightfully recognized on its first day.¹ In the U.S., timber that is sourced from the United States is often sent to Canadian lumber mills for processing. Likewise, Canadian businesses have invested substantially throughout the U.S., operating lumber mills in nearly every region of the country.

In its notice, the Department expressed particular interest in comments or information related to the following:

1. The current and projected demand for timber and lumber in the United States
2. The extent to which domestic production of timber and lumber can meet domestic demand;
3. The impact of current trade policies on domestic timber, lumber, and derivative product production, and whether additional measures, including tariffs or quotas, are necessary to protect national security

Our abbreviated comments will seek to provide context for these three points that we hope the Department will consider during its comment review period.

¹ White House. "Delivering Emergency Price Relief for American Families and Defeating the Cost of Living Crisis." *The White House*, 20 Jan. 2025, www.whitehouse.gov/presidential-actions/2025/01/delivering-emergency-price-relief-for-american-families-and-defeating-the-cost-of-living-crisis/.

1. The current and projected demand for timber and lumber in the United States

Lumber plays a crucial role in the residential construction sector. As the preferred material for flooring, roofing and framing, NLBMDA's lumber dealers have provided lumber and its derivative wood products to homebuilders and contractors for generations. Over the last few decades, there has been a growing consensus that the United States is facing a severe shortage of housing units. In 2024, Brookings Institute estimated that the U.S. Housing market was short 4.9 million housing units.² In order to meet this demand, the residential construction sector will need steady and reliable access to lumber. Measures which restrict the market's access to foreign lumber may jeopardize efforts to address the nation's housing shortage.

2. The extent to which domestic production of timber and lumber can meet domestic demand.

Our industry is supportive of the administration's initiative of increasing domestic sourcing of lumber to reduce reliance on foreign imports through strengthening the U.S. timber industry. However, it is important to recognize that achieving this goal will take time and require significant investment in both infrastructure and sustainable forest management. While domestically available species such as Southern Yellow Pine are a valuable resource, they do not serve as a direct substitute for the many applications where Canadian Spruce-Pine-Fir (SPF) is preferred. As long as homebuilders and contractors continue to indicate a preference for Canadian SPF, it is critical that the Department not engage in measures which prohibit the sale of these goods in the free market.

3. The impact of current trade policies on domestic timber, lumber, and derivative product production, and whether additional measures, including tariffs or quotas, are necessary to protect national security

In 2024, the Department announced an increase on the duty rate for Canadian softwood lumber, increasing the countervailing and anti-dumping duty rates to a combined 14.54 percent. Earlier this year, the Department further preliminarily determined its intention to raise the anti-dumping rate on Canadian softwood lumber from 7.80 percent to 20.07 percent. An adjustment to the countervailing duty is anticipated by the Department this summer. Given the Department's intentions to increase Canadian softwood lumber duty rates, additional measures would be duplicative and detrimental to housing affordability in the United States.

² Perry, Andre M., and David Harshbarger. "Make It Count: Measuring Our Housing Supply Shortage." *Brookings Institution*, 14 Dec. 2024, www.brookings.edu/articles/make-it-count-measuring-our-housing-supply-shortage/.