



Decorative Hardwoods Association®

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Phone: (703) 435-2900

May 23, 2022

TO: Office of Management and Budget
RE: RFI Build America, Buy America Act

The Decorative Hardwoods Association (DHA)¹ appreciates this opportunity to comment on construction materials and manufactured products under the Build America, Buy America Act. DHA represents North American manufacturers of hardwood plywood, hardwood veneer and engineered wood floors.

Regarding question #1 in the RFI, DHA believes unfinished hardwood plywood and unfinished hardwood veneer should be added to the list of construction materials. Unfinished hardwood plywood and unfinished hardwood veneer are similar to lumber which is on the list of construction materials. Prefinished hardwood plywood, prefinished veneer and engineered wood floors should be considered manufactured products.

Regarding question #2, the following manufacturing processes should be included in “all manufacturing processes” for unfinished hardwood plywood and unfinished hardwood veneer:

- Veneer slicing
- Plywood core manufacturing
- Gluing of hardwood veneer on a plywood core
- And sanding

Regarding question #5, current capacity utilization for hardwood plywood is approximately 50%. Thus, regarding question #6, we believe significant capacity exists to domestically supply unfinished hardwood plywood.

Thank you again for the opportunity to comment on construction materials under the Act. If you have any questions, please contact me at kchristman@decorativehardwoods.org or 703-435-2900 ext. 101.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith A. Christman".

Keith A. Christman
President
Decorative Hardwoods Association

KChristman@decorativehardwoods.org

¹ The Decorative Hardwoods Association represents over 75 North American manufactures of hardwood plywood, hardwood veneer, engineered wood floors and their suppliers and distributors.