



AMERICAN WOOD COUNCIL

November 30, 2018

Dear Senator:

I am writing on behalf of the American Wood Council (AWC) to express our strong opposition to S. 1261, which will be before the Senate Budget Committee on Monday, December 3.

The American Wood Council (AWC) is the voice of North American wood products manufacturing, representing over 86 percent of an industry that provides approximately 450,000 men and women in the United States with family-wage jobs. We are committed to ensuring a resilient, safe, and sustainable built environment. We also develop state of the art engineering data, technology, and the written design standards referenced in the building Code. We provide training and continuing education on wood design to fire service personnel, design professionals, and building code officials.

Importantly, the model code does not discriminate or favor one building material over another, reinforcing the equivalent performance concept. Under the code, all building components are evaluated by standardized tests, and all that receive compliant ratings can be used. Engineers, architects, developers, and contractors are then given design freedom to choose among the most cost-effective materials that meet the stringent criteria in the Code. Despite what you might hear, it is erroneous to believe that, because a product is claimed to be non-combustible, it won't fail in a fire. Fires don't start in the materials of construction – rather, fires begin in the spaces of buildings we occupy, and into which we bring combustible, flammable, and toxic materials. The progression of a fire from these furnishings and contents to the building materials themselves, is delayed by building code design, allowing safe occupant evacuation.

Provisions adopted by the State of New Jersey in the 2015 *International Building Code* regarding heights, areas, and types of construction were carefully developed through the International Code Council's (ICC) multi-stakeholder process, involving representatives from the building code community, fire officials, design professionals, and materials interests from across the United States, including many from New Jersey.

The proposition to reduce certain building heights and areas has been brought up time and time again and repeatedly fails because the code already addresses the issue of combustible construction through equivalent performance. Notably, S. 1261 is being promulgated by the concrete industry to increase market share. The Build with Strength Coalition has attempted to change other state and local jurisdictions and each effort has been soundly rejected. Despite claims by competing materials, the long-established code development process works very well

to ensure that state-of-the-art building code provisions are regularly adopted. Notably, the building code is based upon equivalent performance, assigning different allowable heights and areas of buildings based upon types of construction and occupancy classification. By controlling the number of stories and area, the risk to an occupant may be maintained at an equal level, regardless of which type of construction is chosen.

Tragic fires in buildings that were under construction account for less than 1% of fires and typically happen when non-combustible gypsum wall coverings, fire doors, smoke alarms, and sprinklers are not in place. Fires also regularly occur in building constructed with concrete and steel. ***The National Fire Protection Association reports fire-related deaths and economic losses declined more than 15% and 30% , respectively, in the past decade. During the same period, over 80% of multi-family buildings were constructed using wood framing. It is erroneous to believe that because a product is claimed to be non-combustible, it won't fail in a fire.***

To address the issue of fire safety on construction sites, the American Wood Council and 40 leaders in fire prevention have formed a coalition to develop best practices, training and fire safety guidance for code officials, firefighters and fire chiefs, developers, and engineers. Information is available here: <https://constructionfiresafety.org/>

Decisions about and adoption of building codes should be determined by local code officials, engineers and design professionals who work with these materials daily. Architects, builders, developers would be denied the freedom provided by wood construction, and forced to use more expensive, less environmentally friendly solutions. The result would essentially cripple wood construction, with no discernible benefits to the residents of New Jersey. It will result in higher construction costs, more expensive housing, and higher rents in a market desperately seeking to find affordable housing solutions.

The use of wood as a framing material in urban environments, specifically for the purpose of constructing multi-family dwellings, as addressed in this legislation, is the only green and sustainable building material that comes from a resource that naturally sequesters carbon. Wood is a cost effective and environmentally sustainable material, providing an important option for safe, affordable housing. It has long been recognized by the ICC process through its *International Building Code*, *International Residential Code*, the *National Fire Prevention Code* and *International Green Construction Code*. We urge you not to be influenced by groups seeking competitive advantage in the marketplace through legislation. It is simply the wrong pathway toward good construction.

In summary, AWC urges Senators to recognize that the best building codes do not result from legislation, but rather from a process that employs the best expertise of building and fire officials, along with the building design community. ICC provides that very process, ensuring that all code provisions are approved by these very experts employed by governmental agencies. While groups like ours participate in the process, the system only permits those tasked with enforcing the code, such as New Jersey's building and fire officials, to approve those provisions.

AWC stands ready to assist you with the technical and engineering expertise to safely construct wood buildings in compliance with today's building, fire, and life safety codes.

Sincerely,

A handwritten signature in black ink, appearing to read 'AWC', followed by a long horizontal line extending to the right.

Andy Dodson
Vice President, Government Affairs