

February 10, 2022

To: Florida Building Commission

The signatory parties support the adoption of mass timber (MT) construction types, (Types IVA, IVB, and IVC), and related requirements, as contained in the 2021 edition of the International Building Code (IBC), into the 2023 Florida Building Code (FBC) for the following reasons:

- In 2016 the ICC Board of Directors appointed the Ad Hoc Committee on Tall Wood Buildings (AHC-TWB) to explore the science of tall wood buildings. Committee and work group members consisted of code officials, fire officials, construction material interests, designers, builders, and other interested parties.

After studying MT for hundreds of hours, and reviewing extensive fire-testing of the material, the AHC-TWB developed and submitted a package of code-change proposals for the 2021 edition of the IBC through the ICC's rigorous code development process. In that process the voting number of ICC governmental member representatives, ranging from 542 to 729 members, and averaging 646 members, voted to adopt all proposed MT changes by margins ranging from 68 percent to 94 percent and averaging 83 percent.

Interests, experts, and associations that testified in support of adding the MT provisions to the IBC included local government building code officials, fire marshals and fire chiefs, materials scientists, fire science researchers and testing agencies, fire protection engineers, structural engineers, multifamily contractors, the United States Forest Service, the International Association of Building Officials, the National Association of Home Builders, the American Institute of Architects, the American Wood Council, APA-the Engineered Wood Association, and Underwriters Laboratories.

- Updating the FBC to permit MT buildings will stimulate investment in its manufacturing and supply chain in FL and put downward pressure on cost and pricing. Investment in MT production is projected to have significant economic benefits for the FL economy because of the state's extensive timber resources. Florida's forest industry contributes \$25 billion to the state's economy, providing more than 124,000 jobs. There are 17 million acres of forestland covering almost half of Florida's total land area. Almost 2/3 of the forestland is privately owned. <https://www.flforestry.org/resources/2017-economic-impact-study/>
- Because of repetitive building layouts in residential multifamily buildings, and the speed of constructing MT buildings, it is predicted that MT will compete successfully with other materials used for multifamily buildings in the 8 -12 story height range. In addition to construction efficiencies, expanded use of MT in these applications can reduce the potential of large construction site fires.
- MT construction sites are safer for workers. Construction sites are also quieter and are less disruptive in the communities where projects occur. MT projects are completed substantially faster than traditional methods of construction, minimizing waste and community impacts while maximizing both worker productivity and developers' returns on investment. In addition, building with pre-manufactured MT panels broadens the available labor pool and will likely alleviate a national shortfall in skilled construction labor.
- Wildland fire safety on both the regional and global scale will benefit from increased use of MT. Low value wood, thinnings, and dead standing trees, can be used for MT, thereby creating a financial incentive for wildland fuels reduction, particularly of ladder fuels, improving regional fire safety and conserving federal and state resources.
- Sequestering carbon in long-lived building materials manufactured from renewable, sustainably managed forests mitigates drivers of climate change and worsening wildland fire seasons and intensities. Sequestering carbon in MT buildings also helps mitigate other issues associated with climate change like the intensity of storms and flooding events.

- Sustainably managed and harvested forests capture more carbon than forests left unmanaged and provide habitat for a greater range of species.
- As a panelized building product, fastened together on-site, MT panels are ideal for buildings designed for disassembly. This means panels, which are easily restored after prior use, can be re-used in new building applications. Carbon stored in MT panels can be sequestered indefinitely as the panels are re-used in future buildings.

For these reasons we encourage the FL Building Commission to adopt the package of MT proposals as incorporated in the 2021 IBC and proposed through the 2023 FBC update process.

Sincerely:

The Conservation Fund  
[www.conservationfund.org](http://www.conservationfund.org)



Florida Forestry Association  
[www.flforestry.org](http://www.flforestry.org)

Forest Landowners Association  
[www.forestlandowners.com](http://www.forestlandowners.com)

Forestry Association of South Carolina  
[www.scforestry.org](http://www.scforestry.org)

Georgia Forestry Association  
[gfagrow.org](http://gfagrow.org)

Keeping Forests  
[keepingforests.org](http://keepingforests.org)

Louisiana Forestry Association  
[www.laforestry.com](http://www.laforestry.com)

National Association of State Foresters  
[www.stateforesters.org](http://www.stateforesters.org)

North Carolina Forestry Association  
[www.ncforestry.org](http://www.ncforestry.org)

Packaging Corporation of America  
[www.packagingcorp.com](http://www.packagingcorp.com)

Rayonier  
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[www.rayonier.com](http://www.rayonier.com)

Southeastern Lumber Manufacturers Association  
[www.slma.org](http://www.slma.org)

Southern Group of State Foresters  
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Tennessee Forestry Association  
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