



October 16, 2015

Jennifer L. Berrier, Director
Bureau of Occupational & Industrial Safety
Department of Labor & Industry
651 Boas Street, Room 1613
Harrisburg, PA 17121
Attn: Chairperson, Uniform Construction Code Review and Advisory Council

Mr. Chairman,

The American Wood Council (AWC) is the voice of North American wood products manufacturing, representing over 75 percent of an industry that provides approximately 29,000 family wage jobs within the Commonwealth of Pennsylvania (see attached). AWC members make products that are essential to everyday life from a renewable resource that absorbs and sequesters carbon. Staff experts develop state-of-the-art engineering data, technology, and standards for wood products to assure their safe and efficient design, as well as provide information on wood design, green building, and environmental regulations.

It has come to our attention that the UCC Review and Advisory Council (RAC) will be discussing House Bill No. 1575, dated September 30th, 2015, at their meeting on October 28, 2015. This particular bill seeks to eliminate the exception currently permitted for dimension lumber equal to or greater than 2-inch by 10-inch nominal sizes as it pertains to the fire protection of floors in residential construction. This exception was specifically included in 2011 in House Bill No. 377, which was passed into law by Act No. 1 during the Corbett administration. The exception is based on provisions of the national model, the 2012 *International Residential Code*, published by the International Code Council. The exception for dimension lumber is appropriate, was recommended by a broad task group consisting of building and fire service officials, and, has been often repeated, is the baseline performance the fire service expects.

The letter to the RAC from State Representative Brian L. Ellis was written on behalf of Brian Ellenberger, President/CEO Allegheny Structural Components. The letter states that Allegheny Structural Components manufactures Open Joist 2000 (OJ), which utilizes finger-joints and adhesives to join web and chord truss components to create an open web parallel chord floor truss. It is a unique and carefully controlled manufacturing process that was introduced by Barrette Structural Distribution, Inc in Trois-Rivieres, Quebec, Canada. Allegheny Structural Components manufactures the Open Joist truss under license from Barrette.

The provisions of Act No. 1 were specifically written to enhance fire safety in buildings, and like the model language from which it is drawn, began with the fire service comfort around the known fire performance of traditional products. Accordingly, the provision permits use of floor



AMERICAN WOOD COUNCIL

assemblies utilizing any product that can demonstrate equivalent performance to a lumber floor assembly with minimum stated dimensions. This equivalency approach has been demonstrated successfully for a number of proprietary products, some of which are specifically recognized by Evaluation Reports issued by the International Code Council Evaluation Service (ICC-ES). An ICC-ES evaluation report was issued to Barrette Structural Distribution, Inc. for a nearly identical product, after demonstrating it meets the equivalency criteria for use in residential floor assemblies without need for further membrane protection. As the Pennsylvania fire service can attest, the provision is needed and a number of products are able to demonstrate that they meet it.

The facts regarding fire resistance of dimensional lumber are well documented by scientific testing and the model code provision under review here has been adopted by dozens of states through their published Building Code Regulations and Standards. Additionally, independent fire experts such as Frank Brannigan, and other professional entities like the National Association of State Fire Marshals, International Association of Fire Chiefs, International Association of Fire Fighters, National Association of Home Builders, and ICC-ES have supported the science and widespread acceptance of unprotected solid sawn lumber in sizes greater than or equal to 2-inch x 10-inch nominal in residential construction.

The American Wood Council will be in attendance at the upcoming meeting of the Review and Advisory Council on October 28th, 2015. We would be pleased to provide additional technical substantiation to refute claims being made that suggests that current provisions of Act No. 1 are flawed. Should you have any questions regarding fire protection membranes for wood floors or any specific questions regarding wood structural components, please do not hesitate to contact me directly at mhunter@awc.org. Thank you.

Regards,

Matthew M. Hunter, BCO
Northeast Regional Manager,
American Wood Council

Cc: Representative Mr. Brian Ellis



WOOD PRODUCTS INDUSTRY AT A GLANCE

PENNSYLVANIA

January 2015

**THE U.S. WOOD PRODUCTS INDUSTRY:**

- Makes products essential to everyday life from a renewable resource that absorbs and sequesters carbon
- Employs about 400,000 people in wood products manufacturing and supports additional jobs in forestry and other industries
- Pays nearly \$1 billion in state and local taxes annually

PENNSYLVANIA, BY THE NUMBERS**EMPLOYMENT***Bureau of Economic Analysis, 2013*

Wood Products	24,233
Forestry & Logging	5,042
Total Employment	29,275

MANUFACTURING FACILITIES*Random Lengths 2014 Big Book*

Sawmills, Millwork, Treating	12
Engineered Wood and Panel Products	1
Other Wood Products	3
Total Facilities	16

*Wood products data does not include paper and pulp industry***ANNUAL PAYROLL INCOME** *(in thousands of dollars)**Bureau of Economic Analysis, 2013*

Wood Products	\$960,769
Forestry & Logging	\$42,015
Total Compensation	\$1,002,784

VALUE OF INDUSTRY SHIPMENTS *(in thousands of dollars)**U.S. Census Bureau Geographic Area Statistics, 2011*

Wood Manufacturing	\$3,261,432
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TAX PAYMENTS *(in millions of dollars)**AWC est. based on Ernst & Young (2012) and Bur. of Econ. Analysis (2012) data*

Estimated State & Local Taxes	\$38
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LAND AREA *(in thousands of acres)**U.S. Forest Service, 2012*

Total Land Area	28,635
Forests	16,782
Forests as Percent of Total	59%
Federal Lands	638
National Forest System	501

TIMBERLAND *(in thousands of acres)**U.S. Forest Service, 2012*

National Forest System	485
Other Federal	92
State, County and Municipal	3,914
Private Corporate	2,111
Private non-Corporate	9,638
Total Timberland	16,241



The American Wood Council (AWC) is the voice of the North American wood products manufacturing industry, providing information on wood design, green building, and environmental regulations and advocating for balanced government policies that affect wood products.