Weyerhaeuser Corporate Headquarters • 220 Occidental Ave S • Seattle, WA 98104

October 12, 2018

Doug Orth, Council Chair
Absher Construction
PO Box 280
Puyallup, WA 98371

Dear Chair Orth and State Building Code Council Members,

Subject: Proposed Amendments to the 2018 International Building Code and 2018 International Fire Code Permitting Tall Wood Construction

Thank you for considering Weyerhaeuser's letter of public comment on the Washington State Building Code Council's proposal to permit Types IV A, B and C mass timber construction allowing for the structural use of mass timber at nine, twelve and eighteen stories. Weyerhaeuser supports the Council's adoption of these amendments proposed to the 2018 International Building Code and 2018 International Fire Code permitting tall wood construction.

For more than a century, the Weyerhaeuser Company has been stewarding timberlands in the Pacific Northwest and manufacturing forest products that improve lives in fundamental ways. Weyerhaeuser's sustainable wood products are used to build homes, and our Sustainable Forestry Initiative-certified tree farms are used for recreation, conservation and different forms of renewable energy. Weyerhaeuser employs 1,777 Washingtonians in 22 rural and urban communities.

Washington's forestry and sustainable wood products industries contribute to regional economies. An industry report recently found that Washington state's timber sector supported 101,434 jobs and $5,488,652,644 in direct, indirect and induced wages in 2017[1]. Adoption of the proposed code amendments could serve to magnify the timber industry's contribution to rural economies in need of innovative manufacturing infrastructure and market demand for timber grown in wildfire-prone regions.

Wood products provide natural, long-term carbon storage and require less energy to manufacture than other products such as concrete and steel. Life-cycle analysis shows that a building with modern mass timber technologies outperforms reinforced concrete in ten of eleven impact categories [2]. The proposed amendments would allow for market integration of these

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[1] Mitchell, Cindy. "Healthy Working Forests Are Essential to Jobs and Washington's Economy." *Washington Forest Protection Association*, http://data.workingforests.org/.

[2] Robertson, Adam B., Frank CF Lam, and Raymond J. Cole. "A comparative cradle-to-gate life cycle assessment of mid-rise office building construction alternatives: laminated timber or reinforced concrete." *Buildings* 2.3 (2012): 245-270.

environmentally-beneficial technologies, and a diverse coalition of private, nonprofit and governmental stakeholders stand ready to deploy mass timber innovation in Washington state.

Washington state is uniquely positioned to lead other states and nations on the use of mass timber in commercial and multifamily residential construction. The clean hydroelectric energy generation powering our state's manufacturing economy means that the gate-to-gate life cycle inventory of mass timber materials sequesters and stores proportionately more atmospheric carbon[3] than would manufacturing these products in areas with fossil-based electric generation portfolios[4]. Therefore, an established mass timber market in Washington state could create future trade potential of low-carbon building materials if the International Code Council also accepts the proposed amendments.

Weyerhaeuser appreciates the State Building Code Council's support of tall wood construction pursuant to Washington State 2018 Engrossed Senate Bill 5450 and looks forward to continued partnership toward building both sustainable urban landscapes and rural economies.

Regards,

Ara Erickson
Director, Corporate Sustainability
Weyerhaeuser Company

[3] Cameron, Ryan E., et al. "A comprehensive greenhouse gas balance for a forest company operating in northeast north America." *Journal of Forestry* 111.3 (2013): 194-205.

[4] Puettmann, Maureen E., and James B. Wilson. "Life-cycle analysis of wood products: Cradle-to-gate LCI of residential wood building materials." *Wood and Fiber Science* 37 (2007): 18-29.