



September 9, 2013

Montana Building Codes Council
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The Coalition for Fair Energy Codes (CFEC), the Montana Wood Products Association, APA – The Engineered Wood Association (APA), and the American Wood Council (AWC) appreciate the opportunity to provide comments on the 2012 International Energy Conservation Code (IECC).

Statement of Interest

CFEC is a consortium of building product manufacturers and associations, including AWC and APA – The Engineered Wood Association, the home building industry, and other parties seeking fair, science-based and impartial treatment for all performance-qualified building products, including wood products, in energy codes. CFEC supports state and local energy codes that provide design flexibility without compromising structural performance and durability. APA members produce 86% of the structural wood panel products manufactured in North America, plus of the majority of engineered wood products that include glued laminated timber, composite panels, wood I-joists, and structural composite lumber. AWC is the voice of North American traditional and engineered wood products, representing over 75% of the industry.

In Montana, forestry and wood products manufacturing companies employ over 4,300 individuals at 21 manufacturing facilities, meeting an annual payroll of over \$160 million. Montana manufacturers produce over \$610 million in wood products and pay an estimated \$22 million in state and local taxes.

Comments on 2012 IECC

The 2012 IECC includes measures that discriminate against the use of wood products and provisions that were not part of the DOE's comprehensive proposal purported to raise the energy efficiency of the IECC by 30% over the 2006 version of the code. Because of the biases against wood products and costly additional requirements that will result in an increase in the cost of housing further impacting a sluggish construction market, CFEC, APA and AWC recommend that the 2012 IECC be amended for use in Montana, to reflect many of the requirements of the 2009 IECC.

Members of the above groups are committed to reducing the environmental impact of new buildings by encouraging energy efficient, environmentally responsible choices during the design and building process. While we support the goal of increased energy efficiency, measures in the 2012 IECC have been shown not to be cost-effective and to provide preferential treatment to one product—foam wall sheathing—despite the existence of wood and other structural products and systems capable of providing equivalent thermal performance and improved structural performance.

Due primarily to building durability concerns and the high cost and poor payback of the 2012 IECC's R20+5 prescriptive wood wall insulation requirement for climate zone 6, states such as Utah, Washington, Idaho and Minnesota have all taken steps to mitigate the impact of the provision, including amending it to reflect the 2009 IECC.

Adoption of an unamended 2012 IECC threatens financial harm to manufacturers, lost manufacturing and construction jobs, and negative consequences to local wood product manufacturing economies. The Montana forest sector provides thousands of well-paying jobs in rural communities across the state. We believe that a fair and balanced building code will preserve these jobs and encourage the growth of the Montana building products industry without sacrificing the state's interest in energy conservation and the structural performance of homes and businesses.

Thank you for your consideration. We look forward to working with Montana toward the adoption of building codes that advance safety and energy codes that not only promote energy efficiency, but the expansion of the Montana economy as well. If you have any questions, please do not hesitate to contact Tom Kositzky, CFEC Executive Director, at 253-620-7423 or tom.kositzky@fairenergycodes.org.

Sincerely,



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