

STOP TALL WOOD – Urge the ICC to Vote No on Mass Timber Proposals that Threaten Public Safety

The International Code Council soon will vote on proposed code changes that among other things would allow tall wood buildings to be built up to 18 stories, despite a lack of rigorous scientific or in-the-field fire and structural testing.

NOW IS THE TIME TO TAKE ACTION by urging the ICC to say no to these dangerous proposals that are up for a final vote which closes on Nov 27, 2018. Join the public hearing process to let your voices be heard. This highly combustible mass timber must be stopped!

TAKE ACTION – SUBMIT PUBLIC COMMENTS OR ATTEND THE PUBLIC HEARINGS!

- **SUBMIT PUBLIC COMMENTS:** Online public comments can be submitted by **July 16, 2018** through the ICC's [cdpACCESS website](#).
- **ATTEND THE PUBLIC HEARINGS:** The ICC [will hold public comment hearings](#) Oct 24-31 in Richmond, Va. Make arrangements to attend and let your voice be heard!

Procedures to Submit a Public Comment to ICC (with sample public comments):

1. Access the ICC 'cdpAccess' website via the link below. The 'cdpACCESS®' website is the ICC's new cloud-based system for the code development process (cdp):
 - <https://www.cdpassess.com/login/>
2. Login with your login or if you do not yet have a login, then Click on "*Click Here to Register*" (note: one does not need to be an ICC member to register and submit public comments – anyone can register and submit as many public comments as they wish)
3. Click on "*My cdpACCESS*"
4. Click on "*Public Comments*"
5. Click "+ *New Public Comment*": (Blue button in the upper right hand of the screen)
6. Use the drop-down menus to search for the Proposal you wish to create a public comment for. Specifically for Tall Wood, the code change proposal G108 is the 'lynch pin'; hence, under "*Subject Matter*" select "*G – IBC – General*" and hit enter, then, under "*Number*" enter '*108*' (without the quotation marks) and hit enter.

“G108-18” should appear in the left and then Click “*Create Public Comment*” to the right of “G108-18”.

NEW PUBLIC COMMENT ASSISTANT

Subject Matter: G - IBC - General | Number: 108 | Part Number: - All - | Hearing Committee: - All -

Proposal: G108-18

Create Public Comment

7. Select an Action from the pull down menu – Select “***Disapprove***”.
 - If you choose “*As Modified by This Public Comment*”, you must choose an Instruction Line. Modify and Further Modify will allow you to use the proposal as the base of your Public Comment; Replace requires you to use the I-Codes text as your base. If you chose *As Modified by This Public Comment*, on the Build Tab you will be able to import and modify code sections.
8. Click “*Create*” in the upper right corner.
9. For all Public Comments: you must fill out your ‘Reason’ and ‘Cost Impact’ statements on the ‘Documentation tab’ (see below). You may optionally include a Bibliography, as well as Notes to Staff.

Confirmation: Successfully Saved

G-108-18-NOVAK-B Unsubmitted

Build | Preview | Discuss | Collaborate | Copyrights | Settings

Documentation | Attachments | Finalize & Submit

SECTIONS	REASON STATEMENT
Reason Statement	N/A
Bibliography	
Cost Impact	
Notes to Staff	

Edit

10. Select "*Reason*" and either enter (or copy & paste) the sample reasons below, modify the sample reasons, or enter your own reason statement.

Some sample reasons you may want to consider for your Public Comment are:

- There is currently no complete testing or engineering justification for expanding the height limitation for mass timber from 6 stories to 18 stories.
- Allowing wood structures to be built above the level of fire department access is a serious mistake.
- Wood does not offer the resilience and fire protection of non-combustible alternatives like concrete and steel.
- Cross-Laminated Timber chars in a fire; however, charring is not equivalent to non-combustible. Note: if the char rate is 1" per hour in a fire, then after 2 hours in a fire, a 6" thick CLT wood load bearing wall will only have 2" of structural material left. This is not acceptable and is not addressed in the code change proposals.
- There has been no wind component involved in the fire testing of Mass Timber assemblies. This is a serious mistake. This type of testing is essential.
- It is unknown what will happen to water that accumulates as a result of a fire sprinkler system discharge as a result of fire or accidental incident that opens a sprinkler head. The system has not been tested with the additional water load and what of the water damage and mold issues?
- Neither the Fire Code Action Committee nor the Building Code Action Committee voted to support this series of Tall Wood / Mass Timber Code Changes.
- Adhesives used between the layers of CLT have not been standardized and are key to whether the CLT delaminates during fire and continues to advance till complete burnout. A test standard for the adhesives has been proposed, but not fully vetted by the cognizant committees.
- The behavior of CLT is completely dependent on the connections, and all connections used to date are proprietary. There is no publicly available information on their design or capacities, even for the Tall Wood Ad-Hoc. There is no information on the performance of the proprietary connections during fires?

11. Select "*Cost Impact*" and enter (or copy & paste) the text below:

- Disapproval of this code change proposal will not increase or decrease the cost of construction. This proposed section provides information that was not previously set forth in the code, thus there is no cost impact when compared with present requirements.

12. You may optionally upload files as needed on the 'Attachments Tab'.

13. Make sure all items on the Finalize and Submit checklist have been checked off.

14. If you submitted a Proposal or online mod this cycle, you will have a copyright form on file. If this is your first time submitting this cycle, you will need to click on the 'Copyright tab', sign a form, and then return to the 'Build tab' to submit your Public Comment.

15. Click 'Submit' at the bottom of the Finalize and Submit tab when your Public Comment is completed.

Finally, once you formally make a public comment kindly send an email notification to Marc Nard at PCA (Mnard@cement.org) such we can help track and support your public comment. Thank you for your time and consideration.