



New York Farm Bureau, Inc. • 159 Wolf Rd, P.O. Box 5330 • Albany, New York 12205-0330 • (518) 436-8495 • Fax: (518) 431-5656 • www.nyfb.org

January 14, 2015

New York State Department of State
Division of Building Standards and Codes
State Fire Prevention and Building Code Council
One Commerce Plaza
99 Washington Ave, Suite 1160
Albany, NY 12231

Dear New York State Fire Prevention and Building Code Council,

New York Farm Bureau, the State's largest general agricultural advocacy organization, wishes to voice its strong opposition to the New York State Building Code Council's proposed adoption of the International Building Code as it relates to structural sawn lumber. Disallowing the local option of sawn lumber that exists today would not only impact those that own small lumber operations, but also farmers and others that choose to use rough cut lumber for building construction.

The International Uniform Building Code requires that dimension lumber used for load bearing purposes in building construction be graded and marked by a lumber grading or inspection agency, something small sawmills can't afford to do. The Building Code Council can provide an alternative, like the one currently in place, which provides that lumber that is neither identified by a grade mark nor issued a certificate of inspection by a grading or inspection agency may be used for load bearing purposes when authorized by the local government enforcing the Uniform Code.

Forestry plays a vital role in New York's economy and contributes over \$8 billion to the state's gross product. There are over 67,000 direct, indirect, and induced jobs from private forests in New York State. Providing an alternative to the International Uniform Building Code will maintain local jobs and economic benefits that might otherwise be lost and provide a low cost alternative for residential home building and for use in other construction projects. This is especially true in rural areas of New York with little hope of economic development, such as the Southern Tier.

It will ensure the feasibility of hundreds of additional portable sawmill owners to continue the practice of producing structural lumber for personal use and maintain market access in many rural areas whose residents would otherwise be required to travel significant distances for such material. It will also maintain an important market for certain timber growing on mostly private land throughout the state. These markets are critical for proper management of the forest in a beneficial and sustainable manner.

We strongly suggest the New York State Department of Codes adopt an alternative that allows a local option for sawn lumber and not adopt the International Uniform Building Code on sawn lumber. This will allow for the continued use of rough cut lumber in construction, as it has been used for hundreds of years.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean E. Norton". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dean E. Norton
President, New York Farm Bureau

cc: Andrew Cuomo, Governor of New York
Patrick Hooker, Deputy Secretary for Food and Agriculture