October 12, 2009

To whom it may concern:

The Montana Building Industry Association is a statewide trade association that represents over 2300 small businesses from across the state of Montana.

The unique characteristics and lack of a thermal cavity in log homes make the R-factor requirements found in the IECC a poor guide for determining industry standards and regulatory minimums. Though the R-factor formula proves to be a good benchmark for stick built homes it leaves log homes at a significant disadvantage.

The International Codes Council (ICC) has recognized that the R-factor rating should not be applicable to log homes. Accordingly, the ICC has published the ICC 400, which is a standard specific to log homes and address energy efficiency.

The ICC 400 has passed through the same public comment and vetting process as the IECC and is cross-referenced in the International Residential Code and the International Building Code.

It is important to note that under ICC 400 log homes still must comply with the 2009 IECC, though through the performance test method.

To preserve the viability of the log home industry throughout the Western United States, while still protecting future consumers, we ask that you amend a portion of the ICC 400 into the 2009 IECC. A footnote to table 402.1.1 would be an appropriate place for the amendment, which reads: Log walls complying with ICC 400 and with a minimum average wall thickness of 5" or greater shall be permitted in zones 5-8 when overall window glazing is .31 U-factor or lower, minimum hearing equipment efficiency of 90 AFUE(gas) or 84 AFUE(oil) and all other component requirements are met.

We appreciate your consideration of our suggested changes.

Sincerely,

Dustin Stewart
Executive Director
Montana Building Industry Association