

Hon. John Garamendi  
Chairman  
Subcommittee on Readiness  
2340 Rayburn  
Washington, DC 20515

Hon. Doug Lamborn  
Ranking Member  
Subcommittee on Readiness  
2339 Rayburn  
Washington, DC 20515

July 29, 2021

Chairman Garamendi and Ranking Member Lamborn,

We write to express our opposition to the Pilot Program on Increased Use of Mass Timber in Military Construction. This section would direct the Secretary of each military department to conduct a pilot program to construct at least one military construction project using mass timber as the primary construction material.

We have significant concerns with policies and programs that tend to promote specific building materials. Engineers and construction professionals should make decisions about which materials to use to meet the codes, standards and specifications of the project. It is inappropriate for Congress to stack the deck for or against specific building materials: Congress should not pick winners and losers and should not promote policies or programs that prefer one building material over another.

Mass timber is often promoted as a sustainable building material. However, it is important to note that there is no environmental superiority of mass timber construction over concrete construction. The embodied carbon of a mass timber building is comparable to the embodied carbon building when the emissions footprint of logging, processing, and shipping are included in the calculations. Compounding mass timber's emissions profile is the opportunity costs of the harvested timber as carbon storage; live three store three times as much carbon as wood products. It is important to recognize the carbonation of in-service concrete buildings as in place concrete absorbs carbon over the life of the building. Concrete can be recycled, further sequestering carbon during its exposure and subsequent life cycle.

Military construction should not be used to promote mass timber. Rather, decisions regarding construction materials should be reserved for the engineers and construction professionals executing those projects.

We strongly oppose the inclusion of the Pilot Program on Increased Use of Mass Timber in Military Construction and urge the Subcommittee to reject programs and projects that arbitrarily specify materials and prefer or promote one particular material.

Sincerely,

National Ready Mixed Concrete Association  
National Stone, Sand & Gravel Association  
Portland Cement Association