



**International Code Council**  
500 New Jersey Avenue, NW  
Sixth Floor  
Washington, DC 20001  
tel: 888.icc.safe (422.7233)  
fax: 202.783.2348  
www.iccsafe.org

## **FEMA NATIONAL ADVISORY COUNCIL MEETING**

**COMMENTS OF:  
THE INTERNATIONAL CODE COUNCIL (ICC)  
500 New Jersey Ave, NW  
Washington, DC 20001  
Website: [www.iccsafe.org](http://www.iccsafe.org)**

**Contact:  
David Karmol, [dkarmol@iccsafe.org](mailto:dkarmol@iccsafe.org)**

The International Code Council (ICC) offers the following comments to the National Advisory Committee, as it meets to hear from its Subcommittees on January 26 and 27, 2011.

The International Code Council (Code Council) is a membership association dedicated to building safety, fire prevention, and energy efficiency. The International Codes, or I-Codes, published by the Code Council, provide minimum safeguards for people at home, at school and in the workplace. Building codes benefit public safety and support the industry's need for one set of codes without regional limitations. The International Code Council also publishes the International Energy Conservation Code (IECC), which is referenced in the Energy Independence and Security Act (EISA) of 2007, and is a national requirement in section 410 of the American Recovery and Reinvestment Act of 2009. Fifty states and the District of Columbia have adopted the I-Codes at the state or jurisdictional level. Federal agencies including the Architect of the Capitol, General Services Administration, National Park Service, Department of State, U.S. Forest Service and the Veterans Administration also enforce the I-Codes for the facilities that they own or manage. The Department of Defense references the International Building Code for constructing military facilities, including those that house U.S. troops, domestically and abroad.

The International Code Council was established in 1994 as a non-profit organization dedicated to developing a single set of comprehensive and coordinated national model construction codes. The founders of the Code Council are Building Officials and Code Administrators International, Inc. (BOCA), International Conference of Building Officials (ICBO), and Southern Building Code Congress International, Inc. (SBCCI). Since the early part of the last century, these non-profit organizations developed three separate sets of model codes used throughout the United States. Although regional code development had been effective and responsive to our country's needs, the time came for a single set of codes. The nation's three model code



**International Code Council**  
500 New Jersey Avenue, NW  
Sixth Floor  
Washington, DC 20001  
tel: 888.icc.safe (422.7233)  
fax: 202.783.2348  
www.iccsafe.org

groups responded by creating the International Code Council and by developing codes without regional limitations; the International Codes.

The Code Council appreciates the work that the NAC is doing, to assist FEMA in its critical work, and to help inform its efforts to avoid the impact of disasters through mitigation, and improve its abilities to provide rapid and effective recovery after disaster events.

We look forward to seeing and reviewing the reports of the National Advisory Council (NAC) Subcommittees, as we believe there are great opportunities in each of the Subcommittees to improve the nation's ability to prepare for, mitigate damages from, and recover more rapidly and with more resilient communities, if proper planning and simple steps based on lessons learned are put into place. While we recognize many of these steps are relatively simple, we know they are not easy, and so we urge the NAC to work cooperatively with us and the many other groups and entities that share their mission, to accomplish its' worthy goals.

In particular, as we commented during the development of the Draft National Disaster Recovery Framework in February 2010, there is a need for FEMA and the National Advisory Council to take a strong position supporting the adoption and use of the most recent model building codes and fire codes as mitigation and disaster preparation strategies. FEMA and the NAC should encourage every local government to adopt and enforce the current model building and fire codes, whether by promotion and publicity, or by explicitly linking recovery assistance and reconstruction aid to the adoption of the most recent model codes.

In the same way that the Department of Energy has become involved in the development, adoption and enforcement support of the International Energy Conservation Code, to achieve DOE goals of reducing building energy use across the nation, so too should FEMA, and the NAC, embrace the proven ability of building codes to mitigate damage from every type of natural and man-made disaster, and to dramatically reduce the costs of response and recovery, including saving countless lives, and preventing billions of dollars of needless property losses.

We noted in our comments to the Draft National Recovery Framework that it is important for FEMA to specifically call out the use of the most recent building codes when it talks of "resilience standards." It is too easy to claim that mitigation practices are in place, when the simplest of mitigation strategies- the adherence to the current model building codes- are



**International Code Council**  
500 New Jersey Avenue, NW  
Sixth Floor  
Washington, DC 20001  
tel: 888.icc.safe (422.7233)  
fax: 202.783.2348  
www.iccsafe.org

overlooked or worse, delayed as an unnecessary expense, or explained away or watered down as too burdensome. Some assume that building codes, once developed, are automatically adopted. Unfortunately, this is not the case. The fact is that each jurisdiction has the opportunity, and the challenge to adopt and enforce the latest building codes, but there is often opposition, based generally on the incremental cost of new codes.

The model codes are developed with expert input from building technology experts from the construction industry, government agencies such as the National Institute of Standards and Technology, insurance groups, as well as the thousands of fire marshals, building code officials and inspectors who see the disastrous results of poor, non-code-compliant construction at disaster and recovery sites all over the world.

At a time when some are suggesting that adopting the latest building codes is “too expensive” or is not “cost effective,” it is entirely appropriate for FEMA and the NAC to call to the attention of the public, and local and state governments that there is also a cost for NOT mitigating the possible effects of natural disasters, in the form of loss of life, loss of homes and businesses, and the huge cost, increasingly borne by the Federal Government, of recovery and relief following natural disasters. The small additional cost of complying with the current codes is a small price to pay, to mitigate the damages that would otherwise occur. Expert reports, by every university, insurance group and governmental body that has studied Katrina (including FEMA’s own assessment team) suggest that the implementation of building codes in Louisiana and Mississippi prior to Katrina would have avoided between 50% and 80% of the damages suffered, saved hundreds of lives, and avoided billions in clean-up and recovery costs.

This is one area where proven technology exists, the answer is clear, and all that is needed is light on the subject, and united voices demanding that the right thing be done. There is no rational reason for communities NOT to adopt the latest, and strongest, building codes as the number one mitigation strategy that is available off the shelf today to avoid and mitigate devastation in the future. Buildings, including homes, last for 100 years or more; the small cost today of building to current codes will be recovered many times over during the life of the building. NAC should use its ability to reach the public and public officials to communicate these messages.



**International Code Council**  
500 New Jersey Avenue, NW  
Sixth Floor  
Washington, DC 20001  
tel: 888.icc.safe (422.7233)  
fax: 202.783.2348  
[www.iccsafe.org](http://www.iccsafe.org)

We appreciate all the good work that FEMA and the NAC are doing, and we ask them to clearly include, as a specific and actionable item in every list of mitigation strategies, the adoption and strong enforcement of the latest model building codes in every community around the nation.

We also suggest that for the growing problem of wildfires, especially those occurring at the interface with urban and suburban communities, that FEMA and NAC explicitly endorse the use of the International Wildland Urban Interface Code, as a means for communities to implement a series of tested and effective tools for reducing the threat of, and the severity of, such fires.

The ICC appreciates the opportunity to present these comments and again commends the outstanding work of FEMA and its staff, and commends the members of the National Advisory Committee on their dedication and efforts to improve the resiliency of America's communities and citizens from the ravages of natural disasters.