July 13, 2018

The Honorable John Thune
Chairman
U.S. Senate Committee on Commerce, Science, and Transportation
512 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Bill Nelson
Ranking Member
U.S. Senate Committee on Commerce, Science, and Transportation
425 Hart Senate Office Building
Washington, DC 20510

The Honorable Ron Johnson
Chairman
U.S. Senate Committee on Homeland Security and Governmental Affairs
340 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Claire McCaskill
Ranking Member
U.S. Senate Committee on Homeland Security and Governmental Affairs
442 Hart Senate Office Building
Washington, DC 20510

Dear Chairman Thune, Ranking Member Nelson, Chairman Johnson, and Ranking Member McCaskill:

As the Senate considers advancing S. 3041, the Disaster Recovery Reform Act of 2018 (DRRA), to the floor, we write to offer our strong support for the DRRA's building code provisions.

Study after study confirms that adopting and effectively implementing current model building codes is the nation's best defense against hurricanes, tornadoes, earthquakes, flooding, and other natural disasters. A FEMA analysis from 2014 estimated approximately $500 million in annualized losses avoided in eight southeastern states due to the adoption of modern building codes.[1] Effective and well-enforced building codes in Missouri have reduced hail damage to homes by 10 to 20 percent on average.[2] And, in the ten years following Florida's adoption of a statewide building code, the code's adoption and application reduced windstorm actual losses by as much as 72 percent, producing $6 in reduced loss to $1 of added cost.[3]

Strong building codes save lives and protect people's homes. They ensure that businesses stay in business by minimizing interruptions and damage to property. They help keep emergency responders safe, and significantly reduce the need for future federal disaster assistance by protecting communities. They are also locally tailored – both through hazard mitigation provisions that tie to a given jurisdiction's location and land features as well as through the ability of an adopting jurisdiction to amend model codes to reflect local considerations.

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[1] FEMA, *Phase 3 National Methodology and Phase 2 Regional Study Losses Avoided as a Result of Adopting and Enforcing Hazard-Resistant Building Codes* (2014). FEMA, *Phase 3 National Methodology and Phase 2 Regional Study Losses Avoided as a Result of Adopting and Enforcing Hazard-Resistant Building Codes* (2014).
[2] Czajkowski, J. & Simmons, K., Convective Storm Vulnerability: Quantifying the Role of Effective and Well-Enforced Building Codes in Minimizing Missouri Hail Property Damage, Land Economics (2014).
[3] Simmons, K.M., et. al., *Economic Effectiveness of Implementing a Statewide Building Code: The Case of Florida*, Land Economics (2018).

The DRRA makes new resources available, both pre- and post-disaster, to support the adoption and implementation of modern model building codes. Notably, it would include, as one of twelve proposed considerations behind FEMA's awarding of pre-disaster mitigation (PDM) grants, a state or local government's facilitation of the adoption and enforcement of modern building codes – providing a small but important incentive for state and locally driven resiliency efforts. The legislation pairs this added consideration with an expansion of PDM grant eligibility to include the adoption and enforcement of current model codes. Lack of resources is one of the main reasons some smaller communities do not update their building codes by adopting more recent editions. In tandem, these provisions further incentivize community resilience through a new PDM grant consideration, provide federal assistance to facilitate jurisdictions' efforts to satisfy that proposed PDM consideration, and, ultimately, strengthen such jurisdictions' prospects for future PDM grants.

The DRRA also appropriately incentivizes the adoption and enforcement of the latest model codes and the latest hazard mitigation provisions therein. Code advancements present cumulative benefits. Codes are updated on fixed intervals, which ensures the latest editions reflect advancements in building science and technology as well as improvements in methodologies that can both enhance building resiliency and reduce cost. For these reasons, we support the DRRA's focus on modern codes.

The DRRA's code provisions enjoy broad based support from state and local governments, emergency managers and responders, manufacturers, contractors, insurers, and resiliency experts. The Senate Homeland Security and Governmental Affairs Committee unanimously supported these provisions in reporting out S. 3041, and they enjoy widespread support in the House, where the House Transportation and Infrastructure Committee unanimously approved nearly identical language. We strongly urge the Senate to retain the DRRA's building code provisions.

Sincerely,

Alliance for National and Community Resilience
Alliance to Save Energy
American Council for an Energy-Efficient Economy
American Institute of Architects
American Society of Civil Engineers
American Society of Heating, Refrigerating and Air-Conditioning Engineers
Association of State Floodplain Managers
BuildStrong Coalition
Congressional Fire Services Institute
Covestro LLC
Dow Chemical Company
DuPont
Environmental and Energy Study Institute
EPDM Roofing Association
EPS Industry Alliance
Extruded Polystyrene Foam Association

Gulf Coast Leadership Conference
Insurance Institute for Business & Home Safety
International Association of Fire Chiefs
International Code Council
Johns Manville
Knauf Insulation
National Association of Mutual Insurance Companies
National Association of Regional Councils
National Association of State Energy Officials
National Association of State Fire Marshals
National Electrical Manufacturers Association
National Institute of Building Sciences
National League of Cities
North American Insulation Manufacturers Association
Owens Corning
Polyisocyanurate Insulation Manufacturers Association
The Pew Charitable Trusts
TopBuild
U.S. Green Building Council