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November 15, 2021

The Honorable Eddie Bernice Johnson  
Chair  
Committee on Science, Space, and Technology  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Frank Lucas  
Ranking Member  
Committee on Science, Space, and Technology  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Chairwoman Johnson and Ranking Member Lucas:

I write to express the International Code Council's support for the Amendment in the Nature of a Substitute (ANS) to H.R. 5781, the National Wildland Fire Risk Reduction Program Act.

The Code Council is a national nonprofit organization, driven by the engagement of its more than 64,000 governmental and construction industry members that facilitates the development of model building codes that help ensure safety, resilience, and sustainability. Our International Wildland Urban Interface Code (IWUIC) serves as the benchmark for wildfire-resistant construction and community mitigation against wildfire risk.

Climate change has led to wildfires that are both more severe and more frequent. In three of the last four years, economic losses from wildfires [topped](#) \$20 billion. In 2020, wildfires destroyed nearly 18,000 structures, more than three times the historic average. The wildland urban interface (WUI) is an area of particular wildfire risk, and one-third of all U.S. homes are now located there. Based on U.S. Forest Service data, one [study](#) found that the WUI has increased from 1990 to 2010, now affecting 43.4 million homes (a 41% increase), and covering 770,000 km<sup>2</sup> (a 33% increase), making it the fastest growing land use type in the conterminous U.S. Given construction and land use trends, we expect even greater increases have occurred in the years subsequent.

The Code Council's International Wildland Urban Interface Code (IWUIC) recognizes that special requirements are necessary in the WUI. The IWUIC is intended to safeguard life and property from the intrusion of fire from wildland fire exposures and fire exposures from adjacent structures and to prevent structure fires from spreading to wildland fuels, even in the absence of fire department intervention.

The congressionally established National Institute of Building Sciences (NIBS) recently [found](#) that retrofitting 2.5 million homes in the WUI to the IWUIC could provide a nationwide benefit-cost ratio as high as \$8:1. These benefits represent avoided casualties, property damage, business interruptions, and insurance costs, and are enjoyed by all building stakeholders – from developers, titleholders, and lenders, to tenants and communities. Other analyses have made similar findings. A McClatchy [analysis](#) following the California Camp Fire in October of 2018 found that 51% of the houses built after a WUI fire code was implemented escaped damage compared to only 18% of the 12,100 houses built prior.<sup>1</sup>

For these reasons, U.S. Fire Administration (USFA) guidelines currently [require](#) that federal buildings above 5,000 ft<sup>2</sup> within the WUI adhere to the current IWUIC. Further, FEMA will not provide federal assistance to rebuild public facilities in the WUI post-disaster unless the construction [adheres](#) to the current IWUIC.

Despite the significant benefits wildfire-resistant codes like the IWUIC provide, and although aspects of the IWUIC are adopted by several states and by nearly 200 communities across 24 states, wildfire resistant construction

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<sup>1</sup> The IWUIC generally meets or exceeds the California structural wildfire code studied.

codes are severely underutilized. For years, wildfire has not been recognized in the same way as other natural hazards, like earthquakes, floods, and hurricanes.

Wildfire-resistant codes can further benefit from additional research and attention. Wildfire code development has not enjoyed the level of participation and expertise brought to bear for other hazards. The probabilistic risk models relied upon by building scientists to estimate code provisions' loss avoidance benefits do not consider wildfire risk or wildfire codes. Although adoption of code provisions that mitigate against other natural hazards are tracked in detail, wildfire resistant code adoption is not. Wildfire hazard maps with community and parcel level detail that correlates with existing wildfire codes do not exist like they do for wind speed and seismicity.

To make meaningful improvements in our national resilience to wildfire, increased focus, collaboration, and investment is required – all of which the National Wildland Fire Risk Reduction Program Act ANS would achieve. The legislation builds on the directed, inter-agency, partnership successes the existing National Earthquake Hazards Reduction Program and National Windstorm Impact Reduction Program have achieved. Under the ANS, an interagency coordinating committee on wildland fire risk reduction is charged with the first major revision to the definition of the WUI in two decades, a critical update given improved understandings in fire science, climate impacts, and trends in land use. Efforts to further improve wildfire codes would be reinvigorated at NIST with the Institute's post-disaster evaluation efforts formalized, coordinated with FEMA, and geared toward ensuring findings are leveraged to better understand the performance of existing wildfire codes and areas where improvement is necessary.

USFA is charged with integrating wildfire risk into existing models, improving our understanding of wildfire risk and the mitigation benefits wildfire codes can provide for communities. Recognizing the need for greater use of construction practices that mitigate wildfire risk, USFA is directed to administer a technical assistance program, which can support the adoption and implementation of wildfire-resistant codes, standards, and land use practices, and to develop hazard maps with the detail necessary for jurisdictions to utilize these measures.

The National Wildland Fire Risk Reduction Program Act represents a comprehensive approach to tackling community wildfire risk that both builds on existing initiatives and enhances future capabilities. The Code Council strongly supports the ANS to H.R. 5781. Thank you for your consideration and for your leadership on this issue.

Sincerely,

A handwritten signature in black ink that reads "Sara C. Yates". The signature is written in a cursive, flowing style.

Senior Vice President, Government Relations  
International Code Council