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November 2, 2020

To: Director Douglas J. Boyle, Indiana Fire Prevention & Building Safety Commission
From: Ron Ritchey, NFSA Great Lakes Field Service Coordinator

Re: Reasons to adopt newer Model Building & Fire Codes & NFPA Referenced Standards

Dear Director Boyle,

NFSA is a strong supporter and advocate for the adoption of the most current Model Building and Fire Codes and referenced NFPA Standards for the State of Indiana. As you may be aware, these codes and standards are vetted thoroughly amongst all stakeholders at the national levels and provide the “minimum requirements” to ensure the safety for both the general public and emergency responders. The cost-benefits of these codes and standards are carefully considered during this process which occurs on a three-year cycle.

The ICC official position is that the “cost impact of a code change proposal is a key factor when considering the adoption of an updated code as the economic impact of the updated code provisions must be factored into the adoption process. The best building safeguards come with a balanced approach to safety that considers costs while increasing the protection for the public through safer structures.” ICC requires that “in all cases, it must be made clear that it is up to the proponent of the code change proposal to substantiate the cost impact of their proposals.” (see <https://iccsafe.org/wp-content/uploads/Cost-Impact-Substantiation.pdf>)

In a presentation titled “**2019 State of Indiana Standard Multi-Hazard Mitigation Plan**” (see attached, pages 27-28) provided to the Fire Prevention & Building Safety Commission on December 3, 2019, by Mary Moran- Disaster Recovery Branch Director, Torrey Glover- State Hazard Mitigation Officer, and Allison Curry, Natural Hazards Planning Manager, reported an “overall hazard benefit-cost ratio” for adopting the more recent “**model codes saves \$11 dollars per \$1 dollar spent**” and projected that “these actions alone would **prevent 600 deaths, 1 million nonfatal injuries, and 4,000 cases of post-traumatic stress disorder.**” The Mitigation Saves reports states “designing new buildings to exceed the 2015 IRC (International Residential Code) and IBC (International Building Code) **would result in 87,000 new, long-term jobs, and approximate 1% increase in utilization of domestically produced construction materials**” and that “**communities, that consistently meet the latest editions of commonly adopted code requirements, culminating in the 2018 IRC and IBC have added 30,000 new jobs** to the construction-materials industry and an approximate 0.3% increase in utilization of domestically produced construction materials for each year of new construction over what it would have been if buildings were designed as they were in 1990.”

The State Multi-Hazard Mitigation Plan lays the foundation to building resiliency in the State of Indiana by identifying Indiana's greatest risks for disasters and creating strategies to mitigate these risks. This plan is required to be updated every five years by the Federal Emergency Management Agency (FEMA). The plan makes Indiana eligible to apply for, and receive, FEMA Hazard Mitigation Assistance funding through the Hazard Mitigation Grant Program, Pre-Disaster Mitigation Grant Program and the Flood Mitigation Assistance Program. (see <https://www.in.gov/dhs/emergency-response-and-recovery/mitigation-and-recovery/>)

The federal Disaster Mitigation Act of 2000 provides the legal basis for FEMA mitigation planning requirements for State, local, and tribal governments as a condition of federal grant assistance. Indiana must have a FEMA approved State Multi-Hazard Mitigation Plan to remain eligible to receive federal assistance through the following programs:

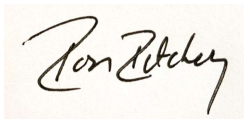
- Public Assistance (Categories C-G)
- Hazard Mitigation Grant Program (HMGP)
- Pre-Disaster Mitigation Grant Program (PDM)
- Flood Mitigation Assistance Grant Program (FMA)
- Fire Management Assistance Grants (FMAG)

Since 2008, Indiana has received almost \$50,000,000 in Mitigation grant funding through these Programs.

The State of Indiana places itself at risk for not qualifying to receive these important FEMA grant assistance programs by not adopting the more recent published model building codes.

It is for these, and a number of other important reasons that the National Fire Sprinkler Association (NFSA) strongly encourages the State of Indiana to adopt the newest published editions of the ICC Building and Fire Codes and referenced NFPA Standards.

Respectfully submitted,



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