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To: [Fire Prevention and Building and Safety Commission](#)
Subject: Code Comments, Proposals and Advice
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Formstack Submission For: **4202**

Submitted at 11/23/20 8:12 AM

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Indiana Code You Are Commenting On:	Current Building, Fire, Mechanical, and Plumbing codes.

Our Floodplain Management Section within the Department of Natural Resources, Division of Water works with communities under a FEMA grant to under the National Flood Insurance Program to provide community assistance, education and outreach. Some of the grant requirements are now or will soon require communities or the states to have building codes adopted in the two previous International Code Council (ICC) code cycles. There are discounts on flood insurance through the Community Rating System (CRS) program if a community chooses to participate. Also, opportunities for Hazard Mitigation Grants, Building Resilient Infrastructure & Communities

Grants (formerly Pre-Disaster Mitigation Grants Program), and other Disaster Assistance programs the building code requirements will apply to moving forward.

To give you an idea about the CRS program communities are currently unable to receive a “class” rating lower than a 7 due to the age of the current building code. We do have a few communities that would qualify for a class 5 or 6 but are unable to get below a class 7 due to the age of the building code within the State. We made great strides earlier this year when the Indiana Residential Code went into effect that now includes the floodplain management rules in the IRC and amendments contained in 312 IAC 10 to include state higher standards. The class rating translates into a 5% reduction in the premium for a community member in a class 9 community for Standard Flood Insurance Policy (SFIP) under the NFIP. An additional 5% is given for each class below a class 9 as well. This may or may not be a significant amount for the policy holders but over the life of a 30 year mortgage the amount becomes significant.

Comment or Proposal:

The same is true with a home or business that is built in a Special Flood Hazard Area (SFHA), depending whether it is built in compliance with the NFIP requirements or not. An example of a residence in the SFHA built at Base Flood Elevation (BFE) the premium would be about \$1,600-1,800/year for the maximum coverage on structure and contents. That same home built at Flood Protection Grade (FPG), required under IRC and 312 IAC 10 the same policy premium would be about \$500-700 a significant savings (\$30k+) over a 30 year mortgage.

Just last month I was in meetings with FEMA and they revealed some numbers from their “No Code, No Confidence” Campaign/Studies. A few of the numbers nationwide: 80% of citizens believe they are protected; 66% would be very or extremely concerned if they found out they had no or inadequate code; there is about a 2% increase in additional cost to construct when applying current codes; over the last 20 years there has been about \$32 billion saved in avoided losses due to having adopted current codes. The last number for savings only takes into account storm and disaster losses prevented, I don’t believe it takes into account other losses such as structure fires and similar items that may have occurred due to lack of current or

adequate codes. I also have FEMA's Building Codes Save that was issued last week for reference where some of the cost savings associated with current codes are documented but the file is too large to upload. Is there a way to get the file over to you?

File:

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