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October 20, 2017

Jill Stern, Chairperson
Construction Codes Coordinating Board
Department of Consumer and Regulatory Affairs
1100 Fourth Street, S.W.
Room 5100
Washington, D.C. 20024
jill.stern@dc.gov

Re: Notice of Emergency and Proposed Rulemaking No. 12-A105 - Amending 12-A DCMR on Fire Code Exterior Wall Requirements, and Subcontractors

Dear Ms. Stern,

Thank you for allowing us the opportunity to comment on the emergency and proposed rulemaking revising the D.C. Building Code related to exterior wall materials published September 29 in the DC Register. The Polyisocyanurate Insulation Manufacturers Association (PIMA) supports adoption of the new requirements regarding fire protection, which were developed as part of the 2015 International Building Code (IBC).

Model codes provide important minimum requirements for consumer protection, health, life safety, and environmental protection. The IBC, one of a suite of model building codes maintained by the International Code Council (ICC), is developed and updated at the national level using an open, transparent, and consensus-based process. Local government officials along with representatives from outside organizations and the federal government work together to ensure that building codes reflect the latest understanding of technical issues and building science.

Model codes are updated every three years. This three-year adoption cycle may seem short, but is necessary due to the constant change in construction practices, building materials, and components. Regular updates on a three-year cycle ensure codes keep in step with innovation. However, these updates to the model code do not become effective until they are adopted at the state or local level. State and local governments serve a key role in not letting their building codes become outdated, which can happen quickly in today's world. Delaying adoption of the latest model building codes places a community at risk.

The recent devastating hurricanes remind us of the importance of up-to-date building codes in helping to create resilient communities. The Federal Emergency Management Agency (FEMA) states that, “adoption and effective enforcement of up to date building codes is the best line of defense against such severe events,” and “is one of the strongest strategies jurisdictions can take to protect a community against the effects of natural hazards.” FEMA also explains that mitigation provided by building codes “increases occupant health and safety during a disaster, protects the local tax base, ensures continuity of essential services, and supports rapid recovery from disasters.”¹

Please contact me if PIMA can be of further assistance to the Construction Codes Coordinating Board.

Sincerely,



Justin Koscher
President

¹ Building Codes Fact Sheet (Building Codes Toolkit), Federal Emergency Management Administration.
https://www.fema.gov/media-library-data/20130726-1903-25045-6866/building_codes_toolkit_fact_sheet.pdf