



Community Resilience Planning Guide for Buildings and Infrastructure Systems (NIST Special Publication 1190)

**COMMENTS OF:
THE INTERNATIONAL CODE COUNCIL (ICC)
500 New Jersey Ave, NW
Washington, DC 20001**

On behalf of The International Code Council (ICC), The National Association of Home Builders (NAHB), The American Gas Association (AGA), The American Institute of Architects (AIA), and National Multi-Family Housing Council (NMHC), and Building Owners and Managers Association (BOMA)

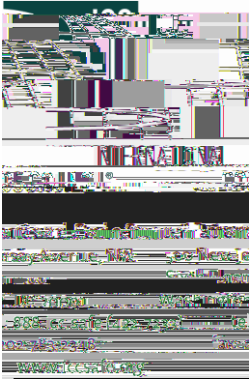
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The International Code Council (ICC), on behalf of its membership, and on behalf of its strategic partners listed above who join in these comments, offers the following comments on the Draft for Public Comment, released April 27, 2015.

The International Code Council (ICC) is a membership association dedicated to building safety, fire prevention, and energy efficiency. The International Codes, or I-Codes, published by ICC, provide minimum safeguards for people at home, at school and in the workplace. Building codes benefit public safety and support the industry's need for one set of codes without regional limitations.

Fifty states and the District of Columbia have adopted the I-Codes at the state or jurisdictional level, typically the International Building Code for commercial and institutional buildings, the International Residential Code for one and two family dwellings, the International Fire Code, and the International Energy Conservation Code. Federal agencies including the Architect of the Capitol, General Services Administration, National Park Service, Department of State, U.S. Forest Service and the Veterans Administration also use the I-Codes for all the diverse facilities that they own or manage. The Department of Defense references the International Building





create a plan to prioritize and implement mitigation actions that will reduce the impact of disasters, and improve the resilience of the community to such events. The goal of such a plan is to make sure that essential systems and buildings remain functional after an event, and reduce the time to recovery for other systems and the buildings that support those systems. While ICC and its partners appreciate the complexity and interdependencies identified by NIST in the Draft CRPG, we will limit our comments to issues that deal specifically with the resilience of buildings, and the policy issues that surround the decisions made to make buildings more resilient, as that is the focus of the model codes we publish, and is where our specific expertise and experience can provide the most value to the process of developing a final draft of the CRPG.

We note that the Draft Report suggests a hierarchy of “performance levels” to define the level of damage, or conversely, the level of usability of buildings following a disaster. These levels are not currently definitions recognized in the model codes, although the codes do recognize and require higher levels of structural and life safety protection for different types of buildings, primarily based on the number of people likely to be living or assembling in the building, as well as other factors such as the age and or mobility of the buildings users, and in some cases the use type of the building. ICC’s code development process does not allow ICC staff to propose, support or oppose changes to the codes, but we welcome proposals to the codes from NIST, from our partners, or from the public that would incorporate suggested changes to the types of buildings recognized, and the level and type of structural and life safety protection that should be afforded to each type. Obviously, decisions regarding those levels of protection will be somewhat controversial, and should be resolved through an open, consensus process, such as the ICC Code Development Process, which allows all stakeholders a voice and a vote in the process of developing the new codes, which are developed and released on a three year development cycle.

The International Codes, are intended and, if adopted and complied with, are successful, at assuring a minimum level of safety for building users and occupants, against known and anticipated disaster events across all the various geographic and climactic regions of the United States. While there are different risks in different areas, the I-codes do take such differences into account, using a number of wind, seismic, and other risk maps to identify areas where higher levels of protection are required against the higher risks of specific disasters in those mapped areas.

Specific Comments

Volume 1, Chapter 2. Form a Collaborative Planning Team.

This section describes the creation of a planning team, and suggest a number of key stakeholders who should be included. While it mentions building owners and operators, no mention is made of builders, developers and the contractors who work in the construction industry. Given the importance of achieving a balance between new regulations and requirements to achieve resilience and the cost of those requirements, to gain broad community



