Date: August 29, 2008

To: James Branham, Lexington Division of Fire, Code Administrators Assn. of Kentucky
   Rob Dwyer, Fire Prevention Inspectors Assn. of Jefferson County
   William Kevin Murphy, Faculty Advisor, Ky. Assn. of Technology Students
   Jeff Bechtold, Northern Kentucky Building Inspectors Assn.

From: Taylor Duncan, CFM, KAMM Chair

Re: Support of RB93 – Including One foot of Freeboard in the International Residential Code

This letter is on behalf of the 120+ member Kentucky Association of Mitigation Managers (KAMM) in support of RB93 in mid-September at the Final Action Hearing in Minneapolis. Many communities in Kentucky already have a freeboard requirement in their local flood damage prevention ordinances, because of FEMA recommendations to maintain compliance with the National Flood Insurance Program (NFIP). This requirement in the IRC would help communities in Kentucky to better protect homeowners from flood damages, and also compliment their flood damage prevention ordinances by having this requirement in the IRC for local building officials. As you
probably remember the previous IRC building code in Kentucky actually had one foot of freeboard in the code. RB93 would automatically require this for all communities in the country who have adopted the IRC.

It is our understanding that the National Association of Home Builders (NAHB) has spoken out against the freeboard amendment. In particular, NAHB expressed concern about how costly it is to truck in large quantities of fill in order to elevate homes in the floodplain. However, there are other ways to elevate homes in floodplains other than trucking in large quantities of fill. For instance, elevating a residential structure by one foot, costs a developer a nationwide average of $1000 at the construction phase. That $1000 cost can be passed on from the builder to the homeowner in the price of the structure. The homeowner will recoup that $1000 very quickly in the reduction of flood insurance premiums for the home, because of that one foot increase in elevation. Adding one foot of freeboard lowers the cost of insurance by 20-40% per year for the life of the home. Those who are concerned about housing “affordability” should rather be concerned about whether or not homeowners can afford flood insurance payments, on top of their monthly mortgage premiums.

Additionally, there is concrete evidence that freeboard has a direct correlation to damages avoided. Requiring one foot increase in elevation may be the difference, in the future, of that home flooding or not flooding during a flood event. Developers need to stop thinking of flood protection as an additional cost to their development or a “burden” put on them by regulators. Flood protection needs to become an investment that they make in their project and in their community – for the safety and well-being of all. A little money spent by developers in the construction phase can save money, heartache and even lives of the property owners in the event of a flood.

We appreciate your attention to this matter and hope that those of you who are attending the Final Action Hearing in Minneapolis in mid-September will support RB93 requiring one foot of freeboard on new home construction. Thank you for all you do for building officials in Kentucky and the country. Please feel free to contact me for additional information and/or discussion anytime at 606-831-5775.

Sincerely,

Taylor Duncan, CFM
Code Enforcement Officer
Cities of Olive Hill/Grayson, Ky.

CC: Larry Larson, PE, CFM : ASFPM Executive Director (by e-mail)
Rebecca Quinn, CFM (by-email)
KAMM Board of Directors (by-email)