

From: [Bumbalov, Stoyan \(DES\)](#)
To: [Curb, Dustin \(DES\)](#)
Subject: FW: WA SBCC Mtg November 17th WUI Code Comments
Date: Tuesday, November 7, 2023 11:30:26 AM

From: Kraig Stevenson <KStevenson@iccsafe.org>
Sent: Tuesday, November 7, 2023 9:31 AM
To: Bumbalov, Stoyan (DES) <stoyan.bumbalov@des.wa.gov>
Subject: WA SBCC Mtg November 17th WUI Code Comments

External Email

Hello Stoyan,

I'm inquiring about the November 17, 2023 SBCC Agenda item #6 2021 IWUIC Code adoption. Is there a sign-up sheet for testimony?

I would like to provide some background on the passage of the legislation SB 6109 and its original content and intent of the legislation. I can shed some light on the mapping done by Dept. Natural Resources and the flexibility the legislation gives to local governments to further define the delineation of their own WUI areas in their jurisdiction. The jurisdictions need to use experts to help them define their WUI areas through data and findings of fact if they don't want to use the state maps. Further local governments can adopt more IWUIC content than that specified in the legislation, but a jurisdiction can not adopt more stringent requirements than what's in the model ICC IWUIC code. The default is if the state map shows areas in the IWUIC, the requirements to be followed are that which the legislation specifically stated. Or the jurisdiction can adopt the IWUIC and their own mapping to address the risk levels in their jurisdiction's WUI areas. There also seems to be a misunderstanding that fuels reduction, mitigation and vegetation management requirements means clear cutting and having barren ground for 30 to 100 ft. That is simply not what the code is requiring. The code considers and allows for conforming and non-conforming defensible space. And if the defensible space is non-conforming, or if the property developer or owner has chosen to not do defensible space then the Ignition Resistant Construction features and requirements increase to create a higher level of ignition resistance for the structure. The defensible space requirements are not intending to cause disruption to wetlands, sensitive areas or critical areas protected by other state and local regulations.

Please consider this email as my supporting written testimony to accompany my testimony on November 17th.

I hope to attend the November 17th SBCC hearing via web-access and to provide testimony and answer any questions that the SBCC members may have.

Best regards,

Kraig

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