

To: The Washington State Building Code Council

From: The undersigned

The passage of SB 6109 in 2018 requires the use of ignition-resistant building construction with no reference to defensible space around residences. We were unaware, until recently, the impact the new draft Wildland Urban Interface Code (WUIC) will have on our communities. Similarly, the 2020 Wildland Urban Interface map referenced in the WUIC was intended by the Washington Department of Natural Resources to be used for guiding home-hardening, not to create defensible space.

It is our strong belief that the WUIC **code will interfere with the following state laws and mandates:**

Besides conflicting with local jurisdictions' codes for tree preservation and re-planting, stormwater retention, and slope stabilization, it is our strong belief that the defensible space part of the draft WUIC Besides conflicting with local jurisdictions' codes for tree preservation and re-planting, stormwater retention, and slope stabilization, the defensible space in the WUIC conflicts with the following state-level codes, regulations, or guidances:

- WA State Urban Forest Management Plan (RCW 76.15.005)
- WA State Climate Commitment Act's carbon sequestration goals
- WA State Growth Management Act, Chapter 365-190, which requires counties to protect habitat, including wetlands and critical areas, and to prepare for climate change
- WA Critical Area Regulations
- WA Shoreline Regulations
- WA Stormwater Regulations
- WA State DNR's Small Forest Landowner Program

It is our belief the code has many unintended consequences: climate change impacts, water impacts, an unacceptable amount of tree loss, loss of heating and cooling functions and other eco services trees provide, effects on housing costs, the development process and ironically, through increased net emissions, the possibility of increased wildfires.

For the above reasons, we ask the SBCC to leave defensible space out of this code cycle and use the next three years to work on a plan that does not create large and unacceptable consequences.

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