



February 23, 2009

Department of Housing and Community Development
Division of Codes and Standards
P. O. Box 31
Sacramento, CA 95812-0031
ATTN: Manufactured Housing Programs

I am writing on behalf of the Institute for Business & Home Safety (“IBHS”), a non-profit organization whose mission is to reduce the social and economic effects of natural disasters and other property losses by conducting research and advocating improved construction, maintenance and preparation practices. IBHS is fully supported by the U.S. property and casualty insurance industry, including a sizable share of the California property insurance sector. Our research and mitigation messages are directed towards natural disasters including earthquake, hail, hurricanes, flooding, tornadoes, and wildfire, as well as other protections for home and business owners.

IBHS strongly supports the pending rulemaking for permanent ignition resistant construction standards for manufactured homes, mobile homes, multifamily manufactured homes and commercial modular structures located in parks in areas designated as a Fire Hazard Severity Zone in California. Increasingly, citizens are choosing to live in areas prone to wildfires. One third of homes in the U.S. are located in what has been termed by fire safety officials as the wildland urban interface (“WUI”) area. The numbers of wildfires are increasing, as well as losses of homes and lives. One of the most devastating fires in recent history was the Witch Creek Wildfire that decimated vast parts of San Diego County and resulted in over \$1 billion dollars of damage. Even more recently, extensive losses caused by Southern California wildfires in November 2008 occurred in the Oakridge Mobile Home Park in the Sylmar district of Los Angeles, where nearly 500 of 608 mobile homes were destroyed by a wall of flames.

IBHS is deeply concerned about California’s growing wildfire threat. In order to contribute to local, state, and national discussions about ways to reduce individual and community vulnerability and reduce wildfire losses, last year, we published a major research report *Mega Fires: The Case for Mitigation* which provides new data and findings that ultimately will help consumers better protect their homes against the ravages of wildfires. IBHS has also developed a wildfire assessment and retrofit guide to be used by homeowners to assess their risks and prioritize ways to protect their homes and property. One of the key findings of the report is that “all homes, regardless of their value, can be best protected from wildfire by implementing appropriate loss reduction measures.” The proposed ignition resistant construction standards for manufactured homes are consistent with this goal.

IBHS is very concerned about the social effects of disasters, as well as the economic effects. Persons displaced from manufactured and mobile homes often do not have the means to secure temporary and permanent replacement housing. The burdens to government and private entities can be overwhelming when attempting to house and feed displaced persons. A proactive approach that includes ignition-resistant construction will lessen the strain on governmental resources, reduce the societal problems witnessed after natural disasters, speed the recovery process for entire communities, and, over the long term, improve the health and well-being of many California citizens.

Moreover, the proposed statewide regulation will allow for cost-effective construction standards and techniques on a statewide basis, reduce the likelihood of construction errors, and provide for uniform enforcement guidelines and training protocols. Our experience with statewide building codes in other contexts indicates that such uniformity is beneficial to all those involved in the construction process and provides the greatest protection to the consumer.

IBHS strongly supports the Department's effort to improve the safety of manufactured and mobile homes located in parks that are in designated WUI areas. On a longer-term basis, we hope the Department will consider similar regulations for mobile and manufactured homes in high risk areas, but which may not be located within a park.

We urge permanent adoption of the emergency regulations.

Sincerely,

A handwritten signature in cursive script that reads "Wanda Edwards". The signature is written in black ink on a light-colored background.

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Institute for Business & Home Safety

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