June 2, 2006

Dr. Gene Whitney
Science Policy Analyst
National Science and Technology Policy Council
Office of Science and Technology Policy
Executive Office of the President
Washington, DC 20502

Dear Dr. Whitney:

The Wind Hazards Reduction Coalition is pleased to have an opportunity to make comments on the Windstorm Impact Reduction Implementation Plan. The Coalition would like to thank the Office of Science and Technology Policy for moving forward with the creation of the implementation plan.

The Coalition played a significant role in the 2004 authorization process that produced Title II of P.L. 108-350, which authorized the National Windstorm Impact Reduction Program. **We believe that any implementation plan for the Windstorm Impact Reduction Act should**

With this legislation, the Federal government can provide increased research funding to mobilize the technical expertise already available to help reduce the significant annual toll in casualties and property damage from windstorms.

Comments on the Windstorm Impact Reduction Implementation Plan

First and foremost, the Wind Hazards Coalition believes that any implementation plan should reflect Title II of P.L. 108-360. This includes recognizing the key role that the Office of Science and Technology Policy (OSTP) plays. Also, the Coalition feels that the critical role of the **Interagency Coordinating Committee** and its leadership role should be properly reflected in the implementation plan. The Coalition feels strongly that coordination between the relevant federal agencies and coordination with relevant state agencies is the key for a program such as the National Windstorm Impact Reduction Program to be successful. With many agencies in different departments, leveraging the efforts of its component parts will always be difficult. However, without a strong Interagency Coordinating Committee it will be impossible.

The Coalition also feels strongly that the **National Advisory Committee on Windstorm Impact Reduction** as established by Title II of P.L. 108-360 should receive a prominent role the Implementation Plan of the Windstorm Impact Reduction Program. As required by the law, the advisory committee should consist of non-Federal members, including representatives of research and academic institutions, industry, and state and local government, who are qualified to provide advice on hazard reduction. The role of the advisory Committee is to assess: trends and developments in the science and engineering of windstorm impact reduction; the effectiveness of the program; the need to revise the Program; and the management, coordination, implementation, and activities of the Program. These activities are vital to the success of the program.

Building Codes and Standards - The Coalition believes that building codes and standards are the foundation upon which loss reduction will be achieved for new construction. Improvements in building codes and standards for buildings and structures and the widespread adoption of these standards has and continues to offer one of the best possibilities for reducing losses in existing buildings and structures. While there have been some dramatic improvements in the structural performance of buildings built to the latest codes and standards, much remains to be done to achieve across the board reductions in losses, especially in our nation's existing building stock. Building codes and standards govern all aspects of new building construction and they need to provide a balance between performance and affordability goals. On-going research is needed to provide a continuing mean for addressing these competing goals. Furthermore, it is clear that simply having strong building codes and standards is not enough. Key factors affecting building performance and loss mitigation include the education of building officials, architects, engineers, builders and sub-contractors and the effective implementation and enforcement of the codes and standards.

Research into the performance of buildings built to the latest building codes and standards versus those built using conventional construction norms, that were impacted by the 2004 and 2005 hurricanes, has shown average reductions in loss

increases in costs if water intrusion issues are effectively addressed and if the performance of

Conclusions

Thank you for the opportunity to comment and we look forward to continuing to work with OSTP and the other Windstorm Impact Reduction Program member agencies to implement and ensure the success of the Program. If we can be of further assistance, please do not hesitate to let