



## Affordability Impact Statement

### 2024 Wildland-Urban Interface Code and local amendments

Date: 8/14/2024

#### Proposed Regulation

The adoption of the 2024 International Wildland-Urban Interface Code (WUIC) and its local amendments will replace the 2015 WUIC and its related local regulations. The WUIC is a model code developed by the International Code Council. It establishes requirements for land use and the built environment within designated wildland-urban interface areas using prescriptive and performance provisions. The code is intended to work as a system of its requirements, providing a comprehensive and holistic approach to enhancing building resilience from wildfires.

A key update in the 2024 WUIC is the introduction of Proximity Zones. Since 2021, the Austin Fire Department (AFD) has used the term "Proximity Class" and "WUI Class" to determine ignition-resistant construction requirements based on distance from wildland areas. The term "Class" has caused confusion with fire resistance classes, leading to the recommendation of "Proximity Zone" to clarify these designations. Aligning with 2015 WUIC Proximity Class designation, the Proximity Zones are based on the distance of the structure from the wildland:

- Zone A: within 50 feet of 40-acre or larger wildland
- Zone B: within 150 feet of 40-acre or larger wildland
- Zone C within 1.5 miles of 750-acre wildlands and within 0.5 miles of 40-acre wildland

In addition to the updated terminology, the 2024 WUIC introduces a 0.5-mile buffer around 40-acre wildlands for Zone C, which expands the WUIC area to include more homes and undeveloped parcels.

Additional updates include:

- A 5-foot Ember Ignition Zone (EIZ) will now be required around buildings in all Proximity Zones. In Zones A and B, this area should be made of gravel, pavers, or other noncombustible materials. In Zone C, the EIZ can include irrigated and mowed turf grass but no other vegetation.
- An increase in the number of buildings a driveway can serve to three buildings, up from two in the 2015 WUIC, including all buildings without dwellings such as accessory uses.
- Structures 100 square feet or larger must now comply with the code, reduced from the previous requirement of 120 square feet.
- A Fire Hazard Severity Form and potential mitigation will be required for developments under the City of Austin's HOME initiative, or where a single fire apparatus access road serves more than 30 dwelling units.
- New requirements include noncombustible skylight frames and protected skylight glass in all Proximity Zones.
- Ignition-resistant fences are required within 10 feet of structures in Zones A and B and within 5 feet in Zone C. There are increased size requirements for exterior posts and ignition-resistant standards for covered porch ceilings and exterior walls in Zones B and C. In Zone A, homes need a 30-minute fire-resistant material test and enhanced flashing for flammable finishes like Ipe wood siding.
- Some requirements have been relaxed, such as a 10-minute fire-resistant material tests for homes more than 50 feet from wildland, and reduced standards for certain deck and boat dock constructions. Boat docks now only require deck and roof protection.
- Zone C has increased protection for eaves, fascia, and exposed rafter tails. Standard deck framing is allowed if the underside is enclosed, and reduced framing requirements apply to decks over slopes. Zone C also permits soffit vents, any exterior wall material for underfloor enclosures, and reduced roof underlayment requirements.
- Zone A & B have increased protection for exposed rafter tails.
- Zone B has increased protection for exterior walls in alignment with the model IWUIC.

## Land Use/Zoning Impacts on Housing Costs

The proposed changes will have a **negative** impact on housing costs via land use/zoning.

The 2024 Wildland Urban Interface Code increases the area subject to additional regulations. According to numbers provided by AFD, Proximity Zones A & B will increase by 33%, from 60,960 acres to 80,930 acres. Proximity Zone C will increase by 327%, from 19,405 acres to 82,886 acres. Under the 2024 Wildland Urban Interface Code, 77% of Austin will fall within at least one Proximity Zone, including the wildland area itself. Most of the increase in area falls into Proximity Zone C, which will have reduced regulations compared to Proximity Zones A and B but would still be subject to requirements like the Hazard Mitigation Form, the 5 ft Ember Ignition Zone, and compliant roof, fence, and accessory materials.

The map on the left below depicts the Travis County Wildfire Risk with white area being the lowest risk and dark red being the highest risk. On the right, the 2024 Proposed WUI map shows the Wildland and Proximity A and B in dark blue and Proximity Zone C in light blue.

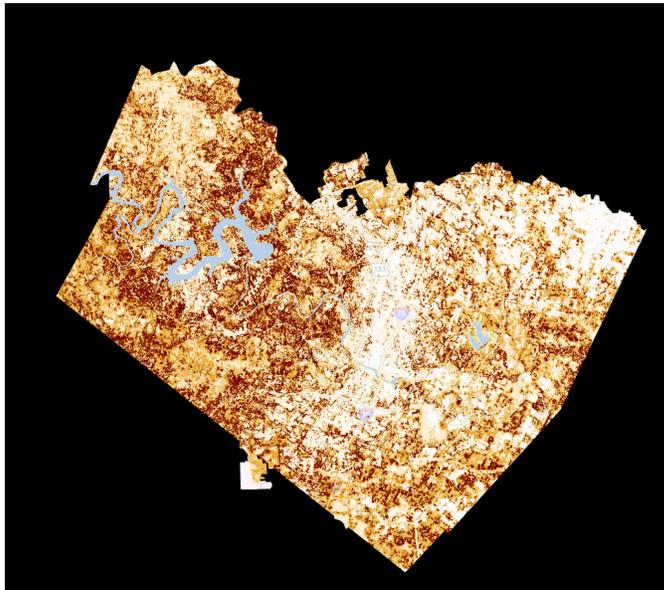


Figure 1: Austin Travis County Wildfire Risk

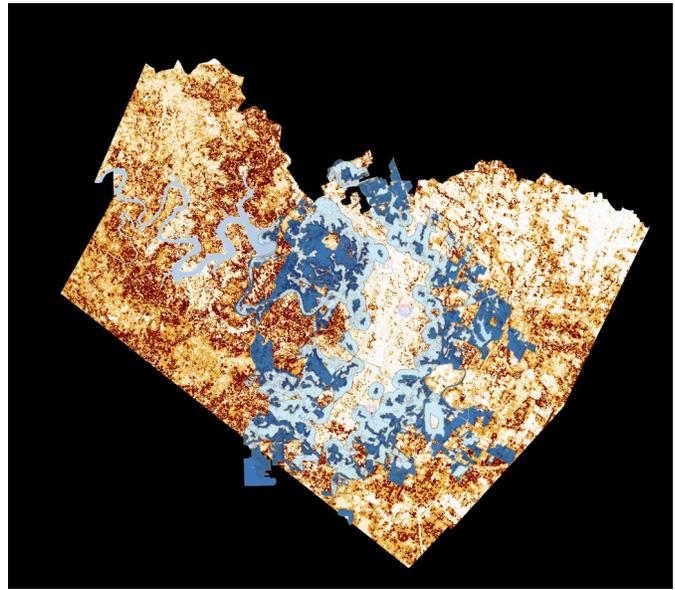


Figure 2: 2024 WUI Map– Overlay on Wildfire Risk Map

Throughout the code development process, the Fire Department considered stakeholder input and made efforts to balance fire preparedness with growth and development goals. The map on the right shows the overlap of the WUI with Subchapter F, the Residential Design Ordinance that controls certain aspect of infill residential construction in Austin’s central neighborhoods. 77% of Subchapter F falls outside the WUI Code, 17% overlaps with Proximity Zone C, and 6% overlaps with Proximity Zones A and B. In Proximity Zone C, the typology that would be most impacted by the WUIC would be single-family and infill residential, but multi-family would see less impact because these structures are already more likely to use non-combustible materials.

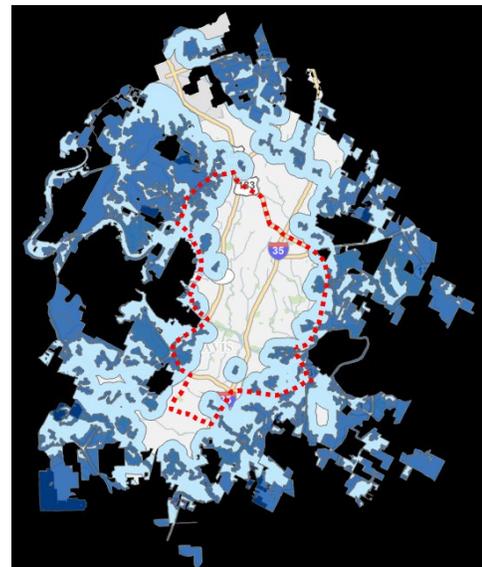


Figure 3: 2024 WUI Map with Subchapter F Boundary

## Impact on Development Cost

The proposed changes will have a **negative** impact on development costs.

According to AFD, primary construction cost increases include the Ember Ignition Zone (EIZ) and enforcing the current fence and covered patio requirements. The primary cost decrease will be for decks constructed in Zone C.

The EIZ will require a change in providing an ignition-resistant zone (with the allowance of turf grass in Proximity Zone C) which may increase the cost for homes with limited or no planned landscaping. Increasing the protection of fences to within 10' for Zones A and B, and 5' for Proximity Zone C may increase cost. Enforcing the code as written will increase cost for some new homes within Zone C that are currently using 6x6 posts and combustible ceilings. For code reduction, decks in Zone C that are located over a slope >10% will no longer have to provide both ignition-resistant framing and ignition-resistant skirting. They can provide one or the other, which is the standard requirement for decks not over a slope.

In addition to potential construction cost increases, additions or alterations as part of development under City of Austin Home Options for Mobility and Equity initiatives will be required to complete the Fire Hazard Severity Form, which may add additional review time. The Austin Fire Department (AFD) is developing a process to determine when a Fire Hazard Severity form is needed for new residential projects submitted under the HOME regulations. This process will consider if essential safety features such as two access points and sufficient water supply are already present. Additionally, AFD is looking into options to exempt WUIC Driveway requirements for lots with a joint use driveway, provided certain conditions are met. These guidelines will be detailed in the upcoming Fire Protection Criteria Manual.

## Impact on Affordable Housing

The proposed changes would have a **mixed** impact on affordable housing. Affordable single-family and infill residential would see the greatest impact but affordable multi-family would see less impact because these structures are already more likely to use non-combustible materials.

The additional construction costs and review may increase the overall budget for some affordable housing projects. However, the additional protections may help homeowners maintain home insurance coverage. The Austin Fire Department (AFD) notes that significant changes, such as the Environmental Impact Zone (EIZ), align with guidance and research from the National Fire Protection Association and the Insurance Institute for Business & Home Safety (IBHS). These IBHS guidelines influence some local insurers, and the AFD has received reports of homeowners being denied renewals or new policies from certain companies. According to the IBHS website, "IBHS members encompass approximately 76 percent of residential property insurance." Aligning requirements and guidance within the 2024 WUIC is intended to provide a strong basis for protection while requiring fewer home updates to maintain insurance coverage.

## Other Policy Considerations

According to [CoreLogic's 2023 Wildfire Risk Report](#), Austin ranks 6th in the U.S. for wildfire risk to homes. These updates are critical to managing the health and safety for Austinites in areas with fire risk. The Proximity Zones should continue to be carefully calibrated to areas with fire risk, while managing construction costs where fire risks are lowest.

Manager's Signature \_\_\_\_\_

A handwritten signature in black ink, appearing to be 'SBD', is written over a light gray rectangular background. The signature is positioned above a horizontal line that extends across the page.