



# CITY OF BUENA PARK

Office of the Mayor

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April 22, 2003

Frederick P. Horn  
Presiding Judge of the Superior Court  
700 Civic Drive West  
Santa Ana, CA 92701

Re: Orange County Grand Jury Report - Wood Roofs are Dangerous

Dear Honorable Judge Horn:

We have received the Grand Jury report that covers the issues related to wood roofs in Orange County. The recommendations based on the findings propose that the City of Buena Park (and all of Orange County) enact a more stringent requirement for future wood roofs to require a minimum of a Class "A" rating. The findings cited in the report conclude that all of Orange County is subjected to the same danger from the Santa Ana winds, which create a combination of high winds and low humidity. The report then outlines how there is a lack of uniformity in local ordinances in each of the jurisdictions. While we appreciate the efforts of the Grand Jury, based on our research we do not believe that a more stringent ordinance for wood roofs is needed in our community.

We do not believe that combining Orange County jurisdictions into one "very high fire hazard" zone is appropriate. Different areas of the County have different fire hazard designations and this accounts for much of the lack of uniformity throughout the county. It makes perfect sense for the designated high hazard areas to have more stringent standards. Buena Park is close to the ocean and it is not as hot or dry as some inland communities. In addition, we do not have the hills, narrow streets, large vegetation areas or some of the other physical attributes that inhibit access for fire fighting.

In light of the above, we believe that we have adopted an appropriate standard in our jurisdiction, which requires all new roofs and re-roofs to be a minimum of Class "C" assembly. What this means is that the small number of wood roofs that exist in our community are predominantly being replaced with asphalt shingles, tile or composite tile materials, and any future wood roofs that may, unlikely because of the cost involved, be installed would be fire-resistive Class "A" or "B" roof assembly. The old non-rated roofs are disappearing due to age, the market, insurance rates and simply styles of new homes.

Per the letter from Foreman Carlos Olvera, we are required to respond to both the findings and the recommendations. Both are listed below with a short response to each using the logic already stated.

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6650 Beach Boulevard, P. O. Box 5009, Buena Park, California, 90622-5009

(714) 562-3754 Fax (714) 562-3506

Findings:

1. *There is a lack of uniformity in local building codes involving roofs for identical environments conditions within Orange County.*

Response: We acknowledge that there are different standards being enforced in Orange County concerning roofs. However, we believe that there are different conditions that exist in the County and one standard is not appropriate for all jurisdictions. Although the environmental conditions are somewhat consistent throughout the County, the geographic and topographic conditions differ considerably. The perceived "lack of uniformity" may have a very logical basis as to allowing each locale to determine the level of mitigation of hazards necessary to provide for the degree of safety that is "actually equal" to other areas of the County and that the citizens of the locale desire.

2. *The testing and qualifications standards of wood shakes and shingles are below the environmental conditions of Orange County.*

Response: The standards for fire retardant pressure treatment of wood, used for up to a Class "A" roof assembly, to the best of our knowledge, has proved to be on track with the State Fire Marshal's recommendations and requirements. We do not have any data that would support this finding in our jurisdiction. Nevertheless, local jurisdictions do not establish testing criteria and qualification standards. National testing agencies such as the International Code Council (ICC), American Society for Testing and Materials (ASTM), and Underwriters Laboratories (UL) are the appropriate agencies to respond to this finding.

3. *The cities' and county's roofing codes do not adequately take into account the climate, particularly the Santa Ana winds, and topographical conditions unique to Orange County.*

Response: This may be the case with some jurisdictions; however, we believe that we have adequately considered these conditions as they relate to our community. City of Buena Park has adopted a Class "C" as the minimum standard for all occupancies, where the State codes would have allowed non-rated installations.

4. *Fire conflagrations stress finite fire fighting resources especially during the period of Santa Ana winds.*

Response: This is primarily true of communities with wildland/urban interface, designated as Very High Fire Severity Zones. Buena Park does not have any such zones and the record of the past decades does not support this finding as it relates to our jurisdiction. We recognize that some areas of the County, that may include heavy brush and vegetation, have caused this referenced demand on available resources on adjoining jurisdictions with mutual aid agreements.

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Recommendations:

1. *Each responding jurisdictional agency should consider amending the building code to require the most fire retardant class of roof covering (Class A) for the new construction of all residential structures (Group R) in all fire zones. (Finding 1 through 4)*

Response: We have considered the recommendation and believe that Class "C" roofing is adequate for all residential structures in our jurisdiction. However, we will reconsider this recommendation during the next cycle of the code adoption in 2005, due to the widespread use of Class "A" for new construction.

2. *Each responding jurisdictional agency should consider amending the building code to require the most fire retardant class of roof covering (Class A) for re-roofing of all residential structures (Group R) in all fire zones, when more than 50 percent of the roof is replaced within one year. (Findings 1 through 4)*

Response: City of Buena Park has adopted a minimum Class "C" for all re-roofing, regardless of percentages of the roof being replaced. We believe that Class "C" roof assembly is adequate for existing structures in our jurisdiction for the reasons stated above.

In conclusion, our analysis indicates that a more stringent requirement for roofs is not needed in our jurisdiction. However, we intend to support and participate in the Orange County Uniform Code Program for amendment and adoption process of the California State Building Code through the involvement of our Building Official with Orange Empire Chapter of ICC. We will continue working within the guidelines of developing uniform codes for safer buildings that our society is willing to accept and able to afford.

If you have any questions, please contact Donald W. Godfrey, Building Manager, at (714) 562 3635.

Sincerely,



Steve Berry, Mayor  
City of Buena Park

cc: Council Members  
Carlos N. Olvera, Foreman, Orange County Grand Jury  
Greg Beaubien, City Manager  
Rick Warsinski, Community Development Director  
Donald W. Godfrey, Building Manager