



CITY OF COSTA MESA

CALIFORNIA 92628-1200

PO BOX 1200

FROM THE OFFICE OF THE MAYOR

May 7, 2003

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

**SUBJECT: MANDATORY RESPONSE TO
ORANGE COUNTY GRAND JURY REPORT
"WOOD ROOFS ARE DANGEROUS"**

Dear Judge Horn,

Costa Mesa acknowledges receiving the subject Grand Jury report covering issues related to residential wood roofs in Orange County. The recommendations based on the findings propose that the City of Costa Mesa (and all Orange County cities) enact a more stringent requirement for future residential wood roof replacements 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 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.

It is our opinion that combining all Orange County jurisdictions into one "very high fire hazard" zone is inappropriate. 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. Costa Mesa is close to the ocean and it is not as hot or dry as some inland communities. In addition, we do not have hills, narrow winding streets, significant native scrub vegetation, or some of the other physical attributes that inhibit access for fire fighting or fuel wildland fires.

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. The old non-rated or Class "C" roofs are disappearing due to age, the market, insurance rates and simply styles of new homes.

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

Findings

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

Response: We acknowledge that there are different standards being enforced in Orange County concerning residential roofing materials. However, we believe 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 for allowing each locale to determine the level of hazard mitigation necessary to provide 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 qualification 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 in some jurisdictions; however, we believe that Costa Mesa has adequately considered these conditions as they relate to our community.

- 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. Costa Mesa does not have any such zones and the record of past decades does not support this finding as it relates to our jurisdiction. We recognize that some rural 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.

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. (Findings 1 through 4)*

Response: We have considered the recommendation and still believe that Class "C" roofing, as approved by the State Building Standards Commission, is adequate for all residential structures in our jurisdiction. However, we will reconsider this recommendation during the next cycle of building code adoption in 2005, or earlier, 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: Such a change would occur in conjunction with Item #1.

The Honorable Frederick P. Horn
May 7, 2003
Page 4

In conclusion, our analysis indicates that mandating a stricter requirement, which would exceed State law, for re-roofing homes in our community, is an excessive financial burden on our homeowners. However, we intend to support and participate in the Orange County Uniform Code Program, for amendment and the 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 community is willing to accept and able to afford. If you have any questions, please contact our Building Official, Rick Brown, CBO, at (714) 754-5273.

Sincerely,



CHRIS STEEL
Mayor Pro Tem

cc: City Council Members
Carlos N. Olvera, Foreman, Orange County Grand Jury
Allan Roeder, City Manager
James Ellis, Fire Chief
Thomas Macduff, Fire Marshal
Thomas Wood, Acting City Attorney
Donald Lamm, Dep. City Mgr.-Development Svs. Director
Rick Brown, Building Official