



County of Orange
California

James D. Ruth
Interim
County Executive Officer

May 6, 2003

Honorable Frederick P. Horn
Presiding Judge of the Superior Court of California
700 Civic Center Drive West
Santa Ana, CA 92702

Subject: Response to Orange County Grand Jury Report, "Wood Roofs
are Dangerous"

Dear Judge Horn:

Per your request, and in accordance with Penal Code 993, enclosed please find the County of Orange response to the subject report as approved by the Board of Supervisors. If you have any questions, please contact Frank Kim at the County Executive Office who will either assist you or direct you to the appropriate individual.

Respectfully,



James D. Ruth, Interim County Executive Officer

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2002-2003 Orange County Grand Jury Report

Wood Roofs are Dangerous

FINDINGS

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

Response: Disagree partially with the finding.

The Grand Jury Report implies that all of Orange County is subject to identical very high fire hazard risks and therefore should have the same regulations (i.e., so that firefighters can distinguish treated roofs from untreated roofs when there is a conflagration or major fire and can decide which house to save first). However, Very High Fire Hazard Severity Zones are limited to about 20% of the County and this zone is almost entirely composed of the National Forest and State or County Wilderness Parks (Figure IX-17 of the Safety Element of the General Plan). While there is very little demand for roofing or reroofing in these areas, Table 3 of the Grand Jury report shows that all of the local jurisdictions with authority for the Very High Fire Hazard Zone areas (including the County) require Class A roofs and Class A reroofs for development within this Zone. Therefore, there is in general uniformity among jurisdictions in Very High Fire Hazard Zone.

Another 20% of the County is classified "High Fire Hazard Severity Zone and this zone is almost entirely composed of the hillside and canyon areas of eastern and southern Orange County. Table 3 of the Grand Jury Report also shows that all of the local jurisdictions (including the County) with authority for these High Fire Hazard Zone require Class A roofs and Class A reroofs for development within this zone. Therefore, there is in general uniformity among County jurisdictions in the High Fire Hazard Zone. Note that in addition to roofing regulations, the County and other jurisdictions have adopted requirements for fire sprinklers in structures located in High Fire Hazard Zones.

Approximately 60% of the County and virtually all of the urban area of the County is not subject to Very High or High Fire Hazard conditions. In these areas, there is a relatively low potential for a conflagration or major fire where firefighters must decide which house to save first. There does not appear to be justification for uniformity of regulations in these areas.

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

Response: Disagree wholly with finding (see response to finding 1)

The County and all cities with areas classified Very High or High Fire Hazard Severity require Class A roofs and reroofs for structures in or near these areas. As noted in the

Grand Jury Report, the State sets the standards for roofing through the State Building Code (and limits the ability of local jurisdictions to vary from the State Code).

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: Disagree wholly with finding (see response to findings 1)

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

Response: Disagree partially with finding (see response to findings 1)

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 new construction of all residential structures (Group R) in all fire zones.**

Response: The recommendation will not be implemented because it is not warranted.

See response to findings 1 above. All jurisdictions with lands in Very High and High Fire Hazard Zones already require, in general, Class A roof coverings 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.**

Response: The recommendation will not be implemented because it is not warranted.

See response to finding 1 above. Again, all jurisdictions with lands in Very High and High Fire Hazard Zones already require, in general, Class A roof coverings for re-roofing residential structures.