

The People are the City

Mayor
SCOTT P. BRADY

City Administrator
ROBERT D'AMATO



Councilmembers:
JUDY A. DICKINSON
NORMAN Z. ECKENRODE
CHRIS LOWE
CONSTANCE UNDERHILL

401 East Chapman Avenue - Placentia, California 92870

April 30, 2003

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

Orange County Grand Jury
700 Civic Center Drive West
Santa Ana, CA 92701

Attention: Carlos N. Olvera, Foreman

**Subject: Response to Findings and Recommendations of
Orange County Grand Jury Report, *Wood Roofs are Dangerous***

In response to your letter dated February 4, 2003, the City of Placentia is responding to the Findings and Recommendations as follows:

Response to Findings

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

1. Environmental conditions are not identical within Orange County. Establishing and enforcing uniformity in building codes involving roofs throughout the County seems unnecessary. There are many cities that are not exposed to as dangerous an environment as other cities during wild fire conditions (Santa Ana winds). Cities like Placentia, Cypress, Huntington Beach, and others do not have hills or forested areas within or in proximity to their boundaries. Cities with hills or forested areas would be exposed to greater danger from windy conditions (Laguna Beach, San Juan Capistrano, Brea, or Yorba Linda).

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

2. Roofing materials are tested and certified by I.C.B.O. (International Conference of Building Officials). Placentia does not have a comment on the accuracy of these testing procedures. This would be like asking about the reliability of U.L. testing of electrical appliances. I.C.B.O. has an Evaluation Services Department in Whittier. This Department provides reports and certifies many building products, not just roofing materials.

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.

3. The City of Placentia has a good roofing policy: New construction requires Class A roofing material and re-roofing requires Class B or better (Policy No. 710, attached). It is not necessary in Placentia to enact a new regulation that would require re-roofing material to be a Class A. Some homeowners and condominium associations (perhaps in CC&R documents) prefer the aesthetics of wood roofs and are willing to pay a greater cost for this roofing material, fire retarding and insurance. Placentia does not have forests or hills where wind/heat storms trigger wild firestorms like the one in Laguna Beach in 1993.

It is the City's opinion that a uniform code is necessary in Orange County because there are climate and environmental differences between cities/areas.

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

4. Placentia is a relatively flat area, nearly fully developed with ample fire hydrants in all developed areas. A wild fire situation is not anticipated in Placentia, even with Santa Ana wind conditions because of the lack of wild fire fuel – hilly or forested areas. Placentia contracts with Orange County

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Fire Authority (OCFA) for fire services. There are two fire stations within the City limits, one in southwest Placentia (Station 35) and one in the northeast area (Station 34). OCFA firefighters may be dispatched from our stations, under mutual aid agreements, to other cities during disasters. In past experiences, during catastrophic events in surrounding cities and during the Laguna Beach Fire Storm of 1993, OCFA provided both continued local response as well as mutual aid.

Response to Recommendations

Recommendation 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. (Findings 2 through 4)

1. No response required from Placentia.

Recommendation 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 roof is replaced within one year. (Findings 2 through 4)

2. As indicated in our response to Finding 3, Placentia's current roofing policy, **Class A roofing material for new construction and Class B or better for re-roofing**, is appropriate for the City's environment. Each city should be able to analyze its own needs/requirements because of different environmental conditions.

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The Orange County Fire Authority has made comments that are attached for your review.

If there are questions or comments, please contact our Chief Building Official, Robert Chang at 714/993-8127.

Very truly yours,



Scott P. Brady
Mayor

SPB/RC/MKA/s

cc: Council Members
City Administrator
Acting Director of Development Services
Chief Building Official
OCFA Division Chief, Richard J. Witesman

Attachments: City of Placentia Policy 710
OCFA Comments

ROOFING MATERIAL

NEW RESIDENCES:

Current policy is that all new residential construction shall use only Class "A" rated roof assemblies. The following products all have this rating and are acceptable:

1. Clay or concrete tile.
2. Three dimensional composition shingles: These shingles vary sufficiently in depth and are random tabbed to take on the appearance of wood shingles when installed. "Three dimensional" is nomenclature applied to the shingles by the Asphalt Roofers Manufacturing Association, and they typically differ from the old-fashioned standard shingles in their weight (300# per square for 3-D shingles vs. 65-300# per square standard).
3. Metal roofing: This material is light weight and either coated with baked enamel pain or treated with other material in order to take on the appearance of shake or shingle.
4. Synthetic tile: This material is made from a composition of synthetic ingredients. It resembles cedar shake.

As new products become available, they may be installed if they:

1. Have a Class "A" rating;
2. Are found to be esthetically attractive;
3. Are approved by the Planning Commission.

EXISTING RESIDENCES:

All materials used for re-roofing an existing residential unit shall have a minimum Class "B" rated roof assembly. This can be clay or concrete tile, three-dimensional composition shingles, metal roofing or wood shake.

**ORANGE COUNTY FIRE AUTHORITY COMMENTS REGARDING
PLACENTIA ROOFING POLICY**

**Subject: Response to Findings and Recommendations of
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Finding 1. There is a lack of uniformity in local building codes involving roofs for identical environmental conditions within Orange County.

OCFA COMMENT: The Fire Authority does believe it is very relevant that roofing requirements across the County be uniform. Wind events in our service area, including the City of Placentia, commonly occur and during such events fires that become established in or on roofs become potential conflagrations. This is because Orange County and City of Placentia lie within the influence of major wind corridors of Southern California, including Brea Canyon, Carbon Canyon, Santa Ana Canyon, Fremont Canyon and several others to the south. It is the location of being in the wind path rather than in a wildland interface that is the problem with fire once started, by whatever means, is spread by wind. An example would be the significant wind damage occurring in the city during the January Santa Ana wind event. Anaheim had a very large roof conflagration in downtown a few years ago where the wind in combination with combustible roofs and other combustible materials were the primary factors of fire spread, resulting in millions of dollars of loss and loss or damage to many buildings and dwelling units.

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

OCFA COMMENT: No specific response other than we can view the testing criteria for the roofs and, in the case of wind and constant sun exposure, the listed test criteria does not consider extreme conditions found in Orange County.

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.

OCFA COMMENT: We also don't think the City's roof ordinance is a bad policy either. Class A is the safest and minimizes risk...policy decision on acceptable risk is up to the City Council.

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

OCFA COMMENT: From a Fire Department operational perspective, any conflagration or major fire incident is a service drain on the City and the Fire Department. We have several local examples of roof fires in areas that are flat, or relatively so, occurring during the 1990's. Not being in the hills or in a wildland interface zone does not safeguard from the service drain caused from conflagration --- i.e., Lemon Heights, Cypress and downtown Anaheim all suffered conflagrations in flat areas where wind or roofing materials were significant factors. Downed powerlines, cigarettes, fireworks, etc. are common causes and fire can spread due to proximity of homes and combustible vegetation in between, even in the absence of wind. The "topographical" findings made by the Grand Jury include density and other factors beside winds (see the section entitled "The Problem," second to last paragraph).

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