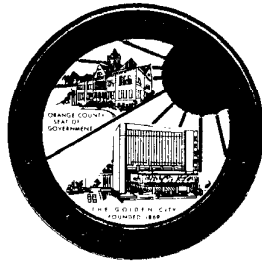


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# CITY OF SANTA ANA

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CLERK OF THE COUNCIL  
Patricia E. Brady

October 27, 2003

T. W. Staple, M.D.  
Foreperson  
2003 -2004 Orange County Grand Jury  
700 West Civic Center Drive  
Santa Ana, CA 92701

Dear Dr. Staple:

We have received a copy of the Grand Jury report addressing issues related to wood roofing materials in Orange County. The report concludes that all cities in the county adopt very stringent and restrictive roofing standards for roof replacement and roofs in new construction.

The analysis of the report appear to conclude that all cities in the county are subject to the exact same fire conditions, and that the use of Class A roofing is the only solution to the perceived problem.

In adopting our most recent edition of the California Building Codes, the City of Santa Ana supported a regional amendment to require a minimum of Class C fire retardant in accordance with the recommendations of the Orange County Uniform Code Program of the International Code Council. These standards were deemed appropriate for development in urban communities that are free from areas that may be classified as high hazard severity fire zones.

Santa Ana has relatively flat terrain and no outstanding topological conditions which dictate we demand Class A fire protection. Although the city is subject to regional Santa Ana wind conditions, our transportation corridors provide ample alternative access points to fight fires throughout the community. We have consistently maintained a Class I fire department rating and an extensively balanced fire prevention system which has demonstrated its ability to contain even the worst fire outbreak in our communities.

The market place in our community has determined there is not a realistic need to dictate such a restrictive code amendment. Our records show that in a city with over 65,000 parcels over the last five years, we have processed only 22 requests to install new or

replacement wood roofs in our community. In 75% of those requests the applicants specified treated materials coupled with solid sheathed surfaces to enable them to get favorable property insurance rates. The total number of requests in our community is less than one-half 1% of our roof permit demand.

### Response to Findings

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

*City Response:* While we concur there is lack of uniform local building codes involving roofs in Orange County; we strongly disagree with the concept that environmental conditions are the same throughout the county. The relatively flat topographical conditions of our community are uniquely different from those communities with major hillside and wooded areas. And, while we agree that our climatic conditions are similar, we strongly believe it is the topological conditions which have the more significant impact upon roof type standards.

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

*City Response:* We have no ability to determine whether the testing and qualification standards of wood shakes and shingles fall below the environmental conditions of Orange County. We adopted a County-wide minimum standard with our adoption of the California Building Code and believe that to be the appropriate standard for this city. We mandate and enforce the California Building Code requirement that all roofing materials be tested and approved by recognized testing labs or meet established prescriptive standards.

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

*City Response:* We don't believe the environmental conditions of Orange County to be so uniform that the cities and the county have a responsibility to have a uniform maximum standard. We acknowledge that California Building Code establishes an appropriate minimum standard for roofing and roofing assemblies. Those cities that have unique topographical and climatic conditions, can (and have) altered their individual codes to meet their locale needs.

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

*City Response:* We concur.

Response to the Recommendations

1. Each respondent 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.

*City Response:* We do not believe that it is prudent public policy to require a Class A standard of roofing in our community, in which there is no unique environmental, topological, or topographical need. The requests for wood shake or shingle roofing is a rare exception in our process and does not justify the city mandating an ordinance amendment. We are strong proponents of the California Building Code, and the current regional amendment regarding roofing that is in place; it has served our community appropriately.

2. Each responding jurisdictional agency should consider amending the building code to require the most fire retardant class of roof covering (Class A) for reroofing of all residential structures (Group R) in fire zones, when more than 50% of the roof is replaced within one year.

*City Response:* We do not believe that it is a prudent public policy to require a Class A standard of roofing in our community, in which there is no unique environmental, topological, or topographical need. We strongly support the state standards that have been adopted for urban areas, and we have no evidence that it has not served our community well.

In conclusion, our analysis and city experiences do not point to adopting more stringent roofing requirements at this time. There simply is no demonstrated need in this community. We have concentrated our resources on a strong fire prevention program and developing the necessary infrastructure to adequately suppress fires when they occur. Given the absence of unique environmental constraints in our community, we do not see the need to impose the constraints of a Class A roofing requirement on our community.

Any questions may be directed to our Building Official, Kenneth Adams at (714) 647-5814.

Sincerely,



David N. Ream  
City Manager