April 2, 2003

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

Dear Judge Horn:

The purpose of this letter is to respond to recommendations included in the 2002-2003 Orange County Grand Jury’s report, “Wood Roofs are Dangerous.” This response is being provided pursuant to Penal Code Sections 933.5 (a) and (b).

Our City Council has reviewed and agrees with these responses.

Thank you for the opportunity to comment on the Grand Jury’s report. If you have any questions, please contact Paul Dudley, Director of Development Services, at (714) 738-6559.

Very truly yours,

[Signature]
Don Bankhead
Mayor

Enclosure: City of Fullerton Response to Grand Jury Findings

cc: Orange County Grand Jury
    Fullerton City Council
    Chris Meyer, City Manager
    Paul Dudley, Director of Development Services
CITY OF FULLERTON
303 W. Commonwealth Ave.
Fullerton, CA 92832

Response to Grand Jury Report
"Wood Roofs are Dangerous"

Findings

Finding No. 1

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

The City of Fullerton agrees with this finding.

Finding No. 2

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

The City of Fullerton agrees with this finding.

However, the use of wood-covered roofs is rare in the City of Fullerton.

Finding No. 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.

The City of Fullerton agrees with this finding.

The City of Fullerton roofing and reroofing requires as a minimum, a Class C "fire treated" roofing assembly. During the next code adoption process, we will consider adopting a new roofing requirement to comply with the Grand Jury recommendation.

Finding No. 4

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

The City of Fullerton agrees with this finding.
During fire conflagration within our City, local resources would be immediately depleted and a mutual aid request would go out to the surrounding communities. Resources would be dispatched to assist based upon availability, and could come from anywhere in Orange County.

RECOMMENDATIONS

Recommendation No. 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.*

The City of Fullerton agrees with this recommendation with qualifications.

The City's minimum requirement for roof covering of new construction of all residential structures (Group R) is Class C, fire treated. Even though the City of Fullerton is in the path of Santa Ana winds, the City of Fullerton is not on list of the Communities at Risk to Wildfires (see Table 2, Grand Jury report).

However, during the next code adoption cycle, we will consider amending the Building Code to require a minimum of Class B roof covering for all new residential structures (Group R). Adoption of a Class B roofing assembly provides for enhanced fire safety and greatly reduce conflagrations.

Recommendation No. 2

*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, when more than 50 percent of the roof is replaced within one year.*

The City of Fullerton agrees with this recommendation with qualifications.

Even though the City of Fullerton is in the path of Santa Ana winds, the City of Fullerton is not on list of the Communities at Risk to Wildfires (see Table 2, Grand Jury report).

However, during the next code adoption cycle, we will consider amending the Building Code to require a minimum of Class B roof covering for reroofing of all residential structures (Group R), when more than 50 percent of the roof is replaced within one year.
ROOF COVERING CLASSIFICATION

The classification for roof coverings as A, B, C, is based on the ability of a given roof covering to withstand a laboratory condition "burning brand" test for a specified time period. A "brand," or more accurately a prescribed arrangement of wood, is placed on the covering and ignited. The classification is based on the length of time to failure with "A" being the most resistant and "C" the least.

The code defines the assemblies as:

**Class “A”** roofing assemblies are effective against severe fire test exposures. Under such exposures, roofing assemblies of this class are not readily flammable, afford a fairly high degree of fire protection to the roof deck, do not slip from position, and are not expected to produce flying brands.

**Class “B”** roofing assemblies are effective against moderate fire test exposures. Under such exposures, roofing assemblies of this class are not readily flammable, afford a moderate degree of fire protection to the roof deck, do not slip from position, and are not expected to produce flying brands.

**Class “C”** roofing assemblies are effective against light fire test exposures. Under such exposures, roofing assemblies of this class are not readily flammable, afford a measurable degree of fire protection to the roof deck, do not slip from position and are not expected to produce flying brands.

A class “A” roof covering might be represented by Fiberglass composition shingles over a layer of drywall over the plywood sheeting attached to the roof rafters. A class “C” covering would be wood shakes pressure impregnated with a fire resistive chemical.

All A, B, C, roofs are classified as fire-retardant, not non-combustible. Non-combustible is defined as cement shingles or sheets, exposed concrete slab, ferrous or copper shingles or sheets, slate shingles, clay or concrete tile, or other approved roofing of non combustible material.