



**Cedar Shake &
Shingle Bureau**

P.O. Box 1178, Sumas, WA, USA 98295-1178

Tel: 604-820-7700 Fax: 604-820-0266 www.cedarbureau.org

December 12, 2014

Department of Building and Safety
Mr. Frank Bush, Executive Officer
201 N. Figueroa Street Room 1000
Mail Stop 115
Los Angeles, CA 90012
Regarding Council File Number 14-0796

cc: Councilman Mitchell Englander
Attn.: Ms. Hanna Lee
200 North Spring Street Room 405
Los Angeles, CA 90012

AND

cc: Los Angeles City Clerk
Ms. Sharon Gin
200 N. Spring Street Room 295
Los Angeles, CA 90012
Email: Sharon.gin@lacity.org

PLEASE INCLUDE THIS INTO COUNCIL FILE 14-0796

RE: LA Municipal Code ("LAMC")

Dear Mr. Bush:

We are writing to express our association's support for proposed changes to the Los Angeles Municipal Code ("LAMC"). Specifically we would like to see the LAMC changed to allow acceptance of product evaluation reports from other accredited certification organizations.

The marketplace has matured and this evolution has resulted in several accredited certification organizations now being able to offer a Listing Report service. Products are held to the same standards and formal testing requirements required under the current LAMC.

The following benefits are associated with opening the LAMC to product evaluation reports from other accredited certification organizations:

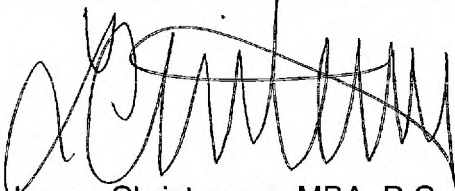
- More products would have access to the Los Angeles Department of Building and Safety's programs and approvals.
- A wider range of products would be an expected result, and thus improve marketplace competitiveness and consumer choice.
- The Citizens of Los Angeles will enjoy much more timely access to the latest product innovations, including those newer products that are considered to be environmentally friendly.

It makes good business sense for the City of Los Angeles to modernize the LAMC by formally recognizing this natural marketplace evolution of Listing Report program providers. We appreciate the opportunity to provide feedback.

Thank you for your consideration.

Yours sincerely,

CEDAR SHAKE AND SHINGLE BUREAU

A handwritten signature in black ink, appearing to read 'Lynne Christensen', written over a horizontal line.

Lynne Christensen, MBA, B.Comm, CAE
Director of Operations



December 8, 2014

Department of Building and Safety
Mr. Frank Bush, Executive Officer
201 N. Figueroa Street, Room 1000
Mail Stop 115
Los Angeles, CA 90012

Cc. Councilman Mitchell Englander, Ms. Sharon Gin

Re: Council File 14-0796.

Dear Mr. Bush,

I respectfully am asking you to consider changing the Code Section 98.0501 and allow LA to accept product evaluation reports from other qualified agencies.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Montie', is written over a faint, illegible typed name.

Eric Montie
General Manager

PLEASE INCLUDE THIS INTO COUNCIL FILE 14-0796

RECEIVED
CITY CLERK'S OFFICE
2014 DEC 29 AM 9:58
CITY CLERK
BY EGG
JOM DEPUTY



RedBuilt™, LLC
200 E Mallard Drive; Boise, Idaho 83706 • Mail: PO Box 60; Boise, Idaho 83707
Ph: (208) 395-2400 • Fx: (208) 395-2443

December 30, 2104

To: Department of Building and Safety
Mr. Frank Bush, Executive Officer
201 N. Figueroa Street Room 100
Mail Stop 115
Los Angeles, CA 90012

Regarding Council File Number 14-0796

CC: Councilman Mitchell Englander
Attn.: Ms. Hanna Lee
200 North Spring Street Room 405
Los Angeles, CA 90012

Los Angeles City Clerk
Ms. Sharon Gin
200 North Spring Street Room 405
Los Angeles, CA 90012
Email: Sharon.gin@lacity.org

PLEASE INCLUDE THIS INTO COUNCIL FILE 14-0796

Subject: Council File 14-0796 (changing LAMC section 98.0501)

This letter is to state Redbuilt's desire for change to the LA Municipal Code (LAMC) Section 98.0501 for Alternate materials, Devices and Methods of Construction. Redbuilt's desire for change focuses primarily on the practice to limit acceptance of evaluation reports to the ICC Evaluation Service or other nationally recognized model code organization.

Redbuilt strongly urges the LAMC to include other organizations that are equally qualified certification bodies similar to the ICC Evaluation Service. By allowing multiple certification bodies, the LAMC will allow competition (fair trade amongst certification bodies) and help control costs to businesses.

If you have any other questions or comments, please contact me directly at 208.395.2493.

Sincerely,

Guy Brousseau, P.E.



The Dow Chemical Company
200 LARKIN CENTER
Midland, MI 48674

-Department of Building and Safety
Mr. Frank Bush, Executive Officer
201 N. Figueroa Street, Room 1000
Mail Stop 115
Los Angeles, CA 90012

December 19, 2014

RE: Council File Number 14-0796

Mr. Bush,

Dow Building Solutions appreciates the opportunity to comment on the need for Modification of Ordinance – LAMC §98.0501, specifically with regard to the exclusive reference to ICC Evaluation Services as the only prescribed code evaluation agency.

We would like to request recognition of the following code evaluation agency providers for which Dow Building Solutions has code evaluation reports (in addition to ICC Evaluation Services):

- Intertek and Architectural Testing Code Compliance Research Reports ([CCRR](#))
- Underwriters Laboratory Evaluation Reports ([ULER](#))
- DrJ Engineering Technical Evaluation Reports ([TER](#))

The revised ordinance wording requested is:

The Department may accept as evidence, for purposes of Article 1 of Chapter IX of this Code, valid evaluation reports on alternate materials, devices or methods of construction developed and published by the International Code Council Evaluation Service (ICC ES), Intertek, Architectural Testing, Underwriters Laboratory and DrJ Engineering. These reports may be based upon data from testing agencies not approved under Section 98.0503 of the Los Angeles Municipal Code. (Amended by Ord. No. 180,868, Eff. 10/22/09.)

All of these agencies are nationally recognized model code evaluation organizations are responsible, utilize specially trained and experienced engineering review staff, and their standards of evaluation are at least equal to the Department's current evaluation standards. We simply wish these organizations to be formally recognized in the ordinance.

The number of products excluded by the sole reference to ICC-Evaluation Services is significant. The approximate number of reports for each organization is as follows:

- ICC-ES - 1350 reports
- Intertek and Architectural Testing - 90 reports
- Underwriters Laboratory - 45 reports
- DrJ Engineering – 100 reports

The non ICC-ES reports comprise 15% of the total reports collectively issued by these organizations. Specifically, it represents 235 products that are not formally recognized by City of LA, through the current restrictions in the ordinance.

We ask that the City of LA recognize the emergence of other credible code evaluation agencies besides ICC Evaluation Services.

Sincerely,



Mae Drzyzga
The Dow Chemical Company
Dow Building Solutions
989-636-2482 (phone)
MEDRZYZGA@DOW.COM (e-mail)

cc: Councilman Mitchell Englander
Attn.: Ms. Hanna Lee
200 North Spring Street Room 405
Los Angeles, CA 90012
Los Angeles City Clerk
Ms. Sharon Gin
200 N. Spring Street Room 295
Los Angeles, CA 90012
Email: Sharon.gin@lacity.org

PLEASE INCLUDE THIS INTO COUNCIL FILE 14-0796

RECEIVED
CITY CLERK'S OFFICE
2014 DEC 23 PM 1:32
BY 84 DEPUTY
CITY CLERK



December 3, 2014

Department of Building and Safety
Mr. Frank Bush, Executive Officer
201 N. Figueroa Street Room 1000
Mail Stop 115
Los Angeles, CA 90012

Re: Council File 14-0796

Dear Mr. Bush:

The purpose of this letter is to support the revision of LA Municipal Code (LAMC) Section 98.0501 for Alternate Materials, Devices and Methods of Construction and the Department of Building and Safety (LADBS) practice to limit acceptance of evaluation reports issued by the ICC Evaluation Service or other nationally recognized model code organizations.

As an engineered wood products manufacturer, we support the acceptance of product evaluation reports issued by recognized product certification agencies, which will expedite the introduction of new products to benefit citizens of the City. We believe the current LAMC Section 98.0501 is unnecessarily restrictive and discourages product innovations by restricting the acceptance of product evaluation reports in the City exclusively to ICC-ES and IAPMO ES. It is our opinion that comparable product evaluation reports issued by competent agencies that are qualified and accredited under a recognized international standard, such as ISO 17065, should be also accepted by LADBS.

Thank you for your consideration.

Philip Vacca, PE
EWP Sr. Engineer

cc: Councilman Mitchell Englander
Attn.: Ms. Hanna Lee
200 North Spring Street Room 405
Los Angeles, CA 90012

Los Angeles City Clerk
Ms. Sharon Gin
200 N. Spring Street Room 295
Los Angeles, CA 90012

PLEASE INCLUDE THIS INTO COUNCIL FILE 14-0796



December 15, 2014

Department of Building and Safety
Mr. Frank Bush, Executive Officer
201 N. Figueroa Street, Room 1000
Mail Stop 115
Los Angeles, CA 90012

Cc: Councilman Mitchell Englander
Attn.: Ms. Hanna Lee
200 North Spring Street, Room 405
Los Angeles, CA 90012

Los Angeles City Clerk
Ms. Sharon Gin
200 North Spring Street, Room 295
Los Angeles, CA 90012
Email: Sharon.gin@lacity.org
PLEASE INCLUDE THIS INTO COUNCIL FILE 14-0796

Regarding Council File Number 14-0796

To Whom It May Concern:

The Metal Construction Association (MCA) is comprised of members of the construction industry throughout North America concerned with the use of metal components in building construction. Many of these members produce or utilize materials that currently require a Los Angeles Research Report (LARR) as defined by the current Los Angeles department of Building and Safety (LADBS).

~~For a product to be recognized for use in Los Angeles based on recognition by ICC-ES or another code organization in lieu of going through the process of obtaining a separate LARR is both beneficial in terms of time and cost. There are however, several other organizations that have the product certification accreditation and expertise such as Intertek/ATI and UL, LLC that can provide Evaluation Reports or Research Reports. These reports provide the same level of product investigation and performance reporting as those provided by ICC ES and allow the product manufacturers to seek out additional regional locations to provide these certification services with no fall-off in performance or safety.~~

As a manufacturer, the ability to choose where an Evaluation Report is created also allows time to introduce multiple products in sequence in the Los Angeles market rather than pushing through a number of changes at one time, further slowing down the already overburdened process.



Several of our members are working with, or have already obtained, evaluation reports from Intertek/ATI and this procedural change may help in product introduction into the Los Angeles market. These evaluation reports have already been successfully used in a number of jurisdictions throughout the United States and we cannot understand why use in the City of Los Angeles would present a different construction experience.

Please consider a proposed modification for Ordinance LAMC §98.0501 to allow for these additional organizations to provide valuable information to allow product use in the City of Los Angeles.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrew F. Williams', is written over a horizontal line.

Andrew F. Williams, PE
Director of Codes and Standards
Metal Construction Association
8735 W. Higgins Road Suite 300
Chicago, IL 60025
847-375-4891
afwilliams@metalconstruction.org



DEPARTMENT OF BUILDING AND SAFETY
201 N. Figueroa Street Room 1000
Mail Stop 115
Los Angeles, CA 90012

Attention: Mr. Frank Bush, Executive Officer

Regarding: **Council File Number 14-0796**

Dear Mr. Bush,

It was recently brought to our attention that the City of Los Angeles Department of Building and Safety (LADBS) is conducting a study of its process for approving of building products as they relate to LA Municipal Code (LAMC) Section 98.0501 for Alternate Materials, Devices And Methods Of Construction, specifically, the practice of limiting acceptance to evaluation reports issued by the ICC Evaluation Service or *other nationally recognized model code organizations*.

It is our belief that the LADBS should recognize evaluation reports issued by other qualified organizations that are accredited as a certification agency under ISO/IEC 17065 and not limit it to ICC Evaluation Service or nationally recognized model code agencies. Such a change will open up the field of recognized evaluation to other highly qualified agencies resulting in:

- More products getting through the evaluation process sooner, thereby making more innovative products available without a loss in the level of public safety provided by the current regulations.
- More products having access to recognition by LADBS.
- More choices for manufacturers in service providers for code evaluation.

Thank you for your consideration and please contact me if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink that reads "Tomo Tsuda".

Tomo Tsuda, PE
Technical Support Manager
Codes, Standards and Product Engineering
Tel: 253-924-3636
E-Mail: tomo.tsuda@weyerhaeuser.com

December 15, 2014



cc: Councilman Mitchell Englander
Attn.: Ms. Hanna Lee
200 North Spring Street Room 405
Los Angeles, CA 90012

Los Angeles City Clerk
Ms. Sharon Gin
200 N. Spring Street Room 295
Los Angeles, CA 90012
Email: Sharon.gin@lacity.org
PLEASE INCLUDE THIS INTO COUNCIL FILE 14-0796

December 15, 2014



December 15, 2014

Department of Building and Safety
Mr. Frank Bush, Executive Officer
201 N. Figueroa Street, Room 1000
Mail Stop 115
Los Angeles, CA 90012

Cc: Councilman Mitchell Englander
Attn.: Ms. Hanna Lee
200 North Spring Street, Room 405
Los Angeles, CA 90012

Los Angeles City Clerk
Ms. Sharon Gin
200 North Spring Street, Room 295
Los Angeles, CA 90012
Email: Sharon.gin@lacity.org
PLEASE INCLUDE THIS INTO COUNCIL FILE 14-0796

Regarding Council File Number 14-0796

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As a manufacturer, the ability to choose where an Evaluation Report is created also allows time to introduce multiple products in sequence in the Los Angeles market rather than pushing through a number of changes at one time, further slowing down the already overburdened process.



Several of our members are working with, or have already obtained, evaluation reports from Intertek/ATI and this procedural change may help in product introduction into the Los Angeles market. These evaluation reports have already been successfully used in a number of jurisdictions throughout the United States and we cannot understand why use in the City of Los Angeles would present a different construction experience.

Please consider a proposed modification for Ordinance LAMC §98.0501 to allow for these additional organizations to provide valuable information to allow product use in the City of Los Angeles.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrew F. Williams', is written over a light gray background.

Andrew F. Williams, PE
Director of Codes and Standards
Metal Construction Association
8735 W. Higgins Road Suite 300
Chicago, IL 60025
847-375-4891
afwilliams@metalconstruction.org



December 15, 2014

Mr. Frank Bush
Executive Officer
Department of Building and Safety
Mail Stop 115
201 N. Figueroa Street, Room 1000
Los Angeles, CA 90012

Regarding Council File Number 14-0796

Dear Mr. Frank Bush:

I have been working in the building products industry for over 4 years, in conjunction with several individuals on my team with extensive building product experience, and have been utilizing ATI's CCRR for the duration. This is the first time I have ever encounter resistance or rejection by a municipality or city in accepting this form of code report. Our company does business throughout the US and Canada, in addition to some international exports, specifically with large customers in the North East, California, and Florida, whom adhere to strict code guidelines. None of them have ever challenged the validity or use of the CCRR. I have previously dealt with ICC reports in part before we made the full switch to CCRR. During the time we used ICC reports, ATI performed ALL of the testing and code compliant audits, vital components to these reports.

By not allowing other code reports on building materials you are greatly limiting the selection of products that can be installed in your area. It would appear you are doing so without justification or rational, which seems additionally worrisome. There is simply no reason to keep the code written in the current language and exclude these other certification programs, such as ATI's CCRR. Both certifications are highly regarded and respected in the industry and used throughout the majority of cities and municipalities in the country. A CCRR is equivalent to an ICC report.

Thank you,

A handwritten signature in black ink that reads 'Beau Buente'.

Beau Buente
Mechanical Engineer
Westech Building Products, Inc.

cc: Ms. Hanna Lee, Ms. Sharon Gin

Please include this into COUNCIL FILE 14-0796

December 17, 2014

Department of Building and Safety
Mr. Frank Bush, Executive Officer
201 N. Figueroa Street, Room 1000
Mail Stop 115
Los Angeles, CA 90012

Dear Sir:

RE: Need for Modification of Ordinance – LAMC §98.0501

In my opinion the Los Angeles Municipal Code (LAMC) Section 98.0501 is severely outdated and no longer capable of fully and effectively providing its intended benefit to the City of LA. In its current state, it hinders the quality and efficiency of the building product approval process used by the Department of Building and Safety(LADBS).

The original intent of LAMC Section 98.0501 and its implementation by LADBS through bulletin P/BC 2011-119, is very clear. It is meant to facilitate expedient product approval for limited categories of building products for which meeting nationally recognized standards of evaluation is considered to be sufficient. Today however, code section 98.0501 is archaic and no longer recognizes the current state of nationally recognized standards of evaluation. Updating the code section is needed to allow the city to realize the full benefit of what was originally intended.

Root Problem: Allows evaluation reports only from the ICC Evaluation Service or other model code organizations.

- Building product evaluation is conducted by product certification bodies.
- ICC Evaluation Service is a certification body, not a model code developer.
- IAPMO Uniform ES (LADBS accepted) is also a certification body, not a model code developer
- Code does not allow LADBS to accept reports from equally qualified Certification Bodies.

Consequence of Current Policy:

- Many quality building products approved for use throughout the U.S. including the state of California are not available for use in the City of LA.
- Limits selection, drives up cost, impedes fair trade and could deny the very best and most advanced product(s) from use in the City of LA.
- Lack of competition for accepted service providers. Instills complacency.
- The current practice is not rational or conducive to the best available standards for qualifying the competence of an organization operating a product evaluation and certification program.

Solution: Recognize the currently accepted organization (ICC Evaluation Service) accurately and give equal consideration to products evaluated and certified by equally qualified Certification Bodies.

- Modify LAMC §98.0501 to allow LADBS to accept product evaluation reports (aka Research Reports) from organizations based upon product certification accreditation and expertise; not affiliation with a model code organization. *Does not disqualify ICC-ES or diminish the current standard of safety.*

Benefits of Change:

- More products having access to expedient approval by LADBS
- Enables competition among accepted service providers. Deters complacency, controls cost, drives up quality, improves efficiency
- Ensures best practices and best products available in the City of LA including more innovative and environmentally-forward products.
- Code change can be used to strengthen the requirements for qualification of third-party product Evaluators.

Yours truly,



Brian Boettger

VP Product Development



Sigmadek Ltd.

suite 260, 600 Crowfoot Crescent NW,
Calgary, AB T3G 0B4

(tel) 403-239-4448

(fax) 403-239-7791

(mobile) 403-975-1752

cc: Councilman Mitchell Englander
Attn.: Ms. Hanna Lee
200 North Spring Street Room 405
Los Angeles, CA 90012

cc: Los Angeles City Clerk
Ms. Sharon Gin
200 N. Spring Street Room 295
Los Angeles, CA 90012
Email: Sharon.gin@lacity.org

PLEASE INCLUDE THIS INTO COUNCIL FILE 14-0796



SWD URETHANE

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800-828-1394 swdurethane.com

December 18, 2014

To: Department of Building and Safety
Mr. Frank Bush, Executive Officer
201 N. Figueroa Street Room 1000
Mail Stop 115
Los Angeles, CA 90012

Cc: Councilman Mitchell Englander
Attn.: Ms. Hanna Lee
200 North Spring Street Room 405
Los Angeles, CA 90012

Los Angeles City Clerk
Ms. Sharon Gin
200 N. Spring Street Room 295
Los Angeles, CA 90012

Re: **Council File Number 14-0796**

- **Please Include This Into Council File 14-0796**

This letter serves as a request to review and modify the current Los Angeles Municipal Code (LAMC) Section 98.0501.

At its inception Section 98.0501 fulfilled a need for an expedited product approval process in that the requirement for a Los Angeles Research Report (LARR) would be waived if the product had an evaluation report from the ICBO Evaluation Service, Inc., at that time the most widely accepted evaluation service organization. The law allowed for other evaluation reports from code-writing bodies, presumably BOCA and SBCCI. ICBO, BOCA and SBCCI have since merged under the International Code Council.

Currently ICC-ES, a certification body, who are affiliated with but not themselves a model code developer and the International Association of Plumbing and Mechanical Officials (IAPMO) Uniform Evaluation Service, also a certification body affiliated with but not themselves a model code developer are the only alternate means to a (LARR) for approval of products and technologies. Note that IAPMO develops a plumbing code although IAPMO UES issues evaluation reports on structural products under the building codes.



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800-828-1394 swdurethane.com

In today's competitive market landscape things have changed significantly with the development of countless state of the art products and technologies and with those changes we have also seen additional certification bodies provide a healthy competitive environment to those certification bodies mentioned above.

Should Section 98.0501 of the LAMC remain unchanged, the City of Los Angeles would only be limiting themselves to those products recognized through ICC-ES or IAPMO UES and would run the risk of the inability to recognize those state of the art products and technologies who have chosen to be evaluated by other accredited certifying bodies. This in my opinion stalls the potential of the City of Los Angeles.

As a current CCRR (Code Compliance Research Report) report holder whose products have been widely accepted in the U.S.A., including the State of California, I respectfully request that LAMC Section 98.0501 be modified to show acceptance of research reports based upon product certification accreditation and expertise and not an affiliation with a model code organization, which ultimately encourages a healthy competitive atmosphere while at the same time allowing the City of Los Angeles the privilege of realizing the best products and technologies currently available in the market place today. The International Accreditation Service (IAS), a subsidiary of the ICC, already accredits several product certification bodies to conduct code evaluations.

Sincerely,

Paul Warren

Building Scientist/ Codes and Engineering Manager



December 18, 2014

Department of Building and Safety
Mr. Frank Bush, Executive Officer
201 N. Figueroa Street Room 1000
Mail Stop 115
Los Angeles, CA 90012

Re: Council File 14-0796

Dear Mr. Bush:

The purpose of this letter is to support the revision of LA Municipal Code (LAMC) Section 98.0501 for Alternate Materials, Devices and Methods of Construction and the Department of Building and Safety (LADBS) practice to limit acceptance of evaluation reports issued by the ICC Evaluation Service or *other nationally recognized model code organizations*.

As an engineered wood products manufacturer, we support the acceptance of product evaluation reports issued by recognized product certification agencies, which will expedite the introduction of new products to benefit citizens of the City. We believe the current LAMC Section 98.0501 is unnecessarily restrictive and discourages product innovations by restricting the acceptance of product evaluation reports in the City exclusively to ICC-ES and IAPMO ES. It is our opinion that comparable product evaluation reports issued by competent agencies that are qualified and accredited under a recognized international standard, such as ISO 17065, should be also accepted by LADBS.

Thank you for your consideration.

Yours truly,

INTERNATIONAL BEAMS INC.

J. Mark Bartel, P.E.

Technical Director

cc: Councilman Mitchell Englander
Attn.: Ms. Hanna Lee
200 North Spring Street Room 405
Los Angeles, CA 90012

Los Angeles City Clerk
Ms. Sharon Gin
200 N. Spring Street Room 295
Los Angeles, CA 90012

PLEASE INCLUDE THIS INTO COUNCIL FILE 14 0796