



STRUCTURAL ENGINEERS ASSOCIATION OF CALIFORNIA

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Oct. 13, 2021

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Re: Implementation of Supervisor Hahn's approved motion of July 13, 2021: Assessing the Safety of High-Rise Buildings In Los Angeles County

PAST PRESIDENT
ALI SADRE *

Dear Mr. Madrigal,

EXECUTIVE DIRECTOR
DON SCHINSKE

(*EXECUTIVE COMMITTEE)

The Structural Engineers Association of California, together with our regional member organization SEAOSC, appreciates the opportunity to advise the Department of Public Works (DPW) and the Los Angeles County Board of Supervisors (the Board) on this important topic.

The motion approved by the Board on July 13, 2021 directs DPW to take six actions. Actions 3 and 4 are our primary focus here because they would involve the practice of structural engineering by SEAOC members, who are licensed Civil and Structural Engineers.

Action 3 would require owners of certain buildings in one neighborhood "to hire a structural engineer and to prepare engineering assessments." While the Board can proactively compel these assessments, we advise DPW to instead achieve their objectives using existing regulations to the extent possible. Relevant existing regulations include the *California Existing Building Code*, which defines "unsafe" and "dangerous" conditions and requires their abatement (we advise using the forthcoming 2022 edition); *California Health and Safety Code* Section 17920.3, which defines "substandard building" with an extensive list of unacceptable conditions; and the *International Property Maintenance Code*, which is available for local jurisdictions to adopt (we advise using the 2024 edition, which includes changes, already approved by the International Code Council (ICC), related to structural condition assessment).

Beyond the immediate scope of Action 3, SEAOC recommends that DPW enhance its existing inspection and maintenance policies for all buildings in Los Angeles County by providing training, continuing education, and certification of building inspectors and plan reviewers.

Action 4 directs a study of the “feasibility of requiring a certification inspection program for all similar type (high-rise) buildings in the unincorporated Los Angeles County area”. We understand a “certification inspection program” to involve engineering assessments beyond the normal scope of routine maintenance inspections. The motion asks about feasibility, but we believe the County should first consider whether such a program would even be necessary or effective for achieving the County’s goals.

At present, SEAOC finds that a new program of mandatory engineering assessments would be premature, and possibly counter-productive, for the following reasons:

- The findings of Action 3 are likely to yield relevant information about whether and how to structure a wider program for the entire county.
- Without an inventory, and while the causes of the Champlain Towers South collapse are still under investigation, there is no equitable or reliable definition of "similar type (high-rise) buildings." Buildings may be alike in age, height, use, occupant load, or location, but from a structural engineering perspective, none of those necessarily indicates similar vulnerability to damage or collapse. An arbitrary focus on certain buildings could improperly suggest that other buildings have been determined to be safe and code-compliant.
- Without an extreme event like an earthquake, the sudden collapse of an occupied, maintained building in California is exceptionally rare. We have seen no evidence, and no analysis of data from the Miami-Dade County program, that mandatory “certification” prevented collapses or that the lack of such a program allowed collapses. Without that justification, a mandatory program could needlessly worry building owners and tenants. By imposing unknown costs, it could also distract owners from work that is more cost-beneficial over the long term, including routine maintenance.
- With respect to feasibility, we have reviewed the draft inspection guideline currently being prepared by ICC and the Florida Building Commission. While such a document would appear to support the development of a program for Los Angeles County, our review has identified a number of serious technical, logistical, professional practice, and cost concerns with respect to implementation in California. The list is longer than this letter allows, but we can provide our additional concerns to DPW on request.

Meanwhile, even without a new mandatory program, the County can develop outreach materials to remind building owners of their responsibility to maintain their buildings, to inform them of the resources available through DPW, to encourage them to understand and manage their risks (with the help of engineers where appropriate), and to explain the applicable existing codes, regulations, and legal precedents.

We thank you again for the opportunity to advise the County of Los Angeles on these matters and encourage your continued collaboration through SEAOSC.

Sincerely,



Kenneth D. O’Dell, SE
SEAOC President, 2021-22