



Date: October 18, 2024

To: Stoyan Bumbalov, Executive Director
California Building Standards Commission
stoyan.bumbalov@dgs.ca.gov

Kyle Krause, Deputy Director, Codes & Standards Division
California Department of Housing and Community Development
kyle.krause@hcd.ca.gov

From: California Building Industry Association
California Building Officials
Rural County Representatives of California
California State Association of Counties
Associated General Contractors of California
California Forestry Association
California Business Properties Association
California Apartment Association
Building Owners & Managers Association

RE: 45-Day Comments
HCD 05/24 CBC Item 20 (adopt 2024 IBC Chapter 16: Section 1608.2)
BSC 05/24 CBC Item 10 (adopt 2024 IBC Chapter 16: Section 1608.2)
{The Continued Availability of Case Studies to Determine Ground Snow Loads in California's Mountain Regions}

The organizations cited above play a vital role in the permitting, inspection, supply, construction, and service of California's mountain communities, ensuring they continue to be essential drivers of tourism and economic growth for our state.

Requested Action:

We respectfully request that you either:

- Return Section 1608.2 for Further Study based on Criteria 3, 4, 5, and 7, allowing the existing Section 1608.2 from the 2021 IBC to remain in effect;
- Amend Section 1608.2 with a California *NOTE* indicating the use of site-specific case studies will continue to be allowed to determine ground snow loads in mountainous regions, provided the local building official approves them; or
- If adopted, we request that you work with California Building Officials on an Information Bulletin indicating that site-specific case studies will continue to be allowed to determine ground snow loads in mountainous regions, provided the local building official approves them.

The Problem:

Section 1608.2 of the 2024 IBC incorporates a new national geodatabase methodology derived from advanced spatial mapping approved by the American Society of Civil Engineers (ASCE 7-22). However, applying this new methodology in California's mountain regions significantly increases minimum ground snow load requirements (in some cases by more than 100%). In addition, there seems to be significant confusion among industry, the enforcement community, and the drafters of the national code provisions regarding the continued use of site-specific case studies approved by the building official.

This issue was raised at the 2024 Structural Design/ Lateral Forces (SD/LF) Code Advisory Committee meeting. Neither BSC nor HCD had proposed a change to IBC Section 1608.2, so no formal action was taken. However, the issue was at least discussed, and there did seem to be a majority of those who felt the new national provision lacked clarity and could lead to confusion in the field.

The industry proponents of Further Study agreed to keep investigating the issue and conducted a stakeholder meeting in late August. Once again, there was significant disagreement between various participants regarding how site-specific case studies could be used once the new provisions took effect. Most concerning was that structural engineers and code enforcement participants with a lengthy history working with snow load provisions could not agree on the extent to which, **if any**, the new provisions would restrict the continued use of site-specific case studies approved by the building officials.

The Potential Impact:

The short answer: Over two billion dollars in pending economic development projects are planned by the private sector throughout the Sierra Nevada and the San Bernardino Mountain regions. These include significant upgrades to existing ski resorts (Mammoth Mountain, Palisades, and Bear Mountain) and new construction and rehabilitation of existing commercial and residential buildings. In addition, counties, municipalities, and special districts throughout California's mountainous regions are planning much-needed

public improvement projects, including workforce housing, schools, hospitals, clinics, fire stations, police stations, and recreational facilities.

We are continuing to evaluate the national proposal of Section 1608.2 of the 2024 IBC but have serious concerns that, as proposed, these changes will dramatically increase the costs of all new construction and **severely limit the use of wood construction materials.**


However, any GSL standard recommendation must be based on actual risk and balanced against efficacy and impacts. **Based on the two extreme snow events in the Sierra Nevada over the past decade, our experience strongly supports the continued use of the case studies we have used for years.**

The Preferred Solution:

We recognize that existing statutes require BSC and HCD to adopt the most recent editions of specified national model codes. However, once adopted, these national provisions become California building code provisions, and there will be occasions when local jurisdictions or interested parties need guidance on these provisions. This is one of those occasions.

As such, we respectfully ask BSC and HCD to consider one of the outlined solutions above (i.e., return for further study, clarify with a note, or provide an Information Bulletin) that clearly and unambiguously states that site-specific case studies, as approved by local building officials, will continue to be allowed in California's mountainous regions.

Sincerely,



Christopher E. Ochoa, Esq.
Senior Counsel for Codes, Regulatory and Government Affairs
California Building Industry Association



Matthew Wheeler, DPPD
Executive Director
California Building Officials (CALBO)



Tracy Rhine
Senior Policy Advocate
Rural County Representatives of California



Mark Neuburger
Legislative Advocate
California State Association of Counties



Peter Tateishi, CEO
Associated General Contractors California.



Matt Dias
President and CEO,
California Forestry Association



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