

December 22, 2022

RangeComm, LLC
9450 Manchester Road, STE 207
St. Louis, MO 63119

RE: **Transitional Care of Roseville**
53,997 SF, 62 Unit / 120 Bed Skilled Nursing Facility
250 Conference Center Dr, Roseville, CA

To Whom This May Concern:

Please consider our request for installation of a composite shingle in lieu of clay tile shingles for our new Skilled Nursing Facility, located at 250 Conference Center Dr., Roseville, CA, due to the factors explained below.

The facility will be under the jurisdiction of California Department of Health Care Access and Information (HCAI), formerly OSHPD, which "monitors the construction, renovation, and seismic safety of California's hospitals and skilled nursing facilities." Per CAN 2-0 (CAC Section 7-103, Chapter 7) our facility will be classified as a Skilled Nursing Facility [OSHPD 2] which states, "H&SC preempts the local building jurisdiction from plan review and approval and construction inspection of skilled nursing facilities and intermediate care facilities; and authorizes OSHPD to review and inspect these facilities. This authority is similar to that established for hospital buildings."

Due to this classification, the facility will be required to comply with sections of the CBC pertaining specifically to OSHPD type 2 buildings. The section directly affecting our roofing material compliance can be found in the 2019 CBC, Section 1513 for HCAI type 1 and 2 buildings titled, "Seismic Anchorage of Slate Shingle, Clay and Concrete Tile Roof Coverings,," with reference to Table 1507.3.7. The requirements noted within these sections significantly increases the cost of installation over the manufactures recommended installation due to the methods, including type and spacing of fasteners, required to comply with seismic anchorage.

In addition to the seismic anchorage requirements, multiple structural components are affected from the added dead load of the clay tiles. From a structural requirement standpoint, while the structure is designated as construction Type V-A, governed under Chapter 16 of the 2019 CBC, as an OSHPD 2 Skilled Nursing Facility, per table 1604.5, the building risk category is III. For comparison purposes, a type V-A, R-2 multi-family building would be a risk category II, based on the same number of beds as our V-A, I-2, OSHPD 2, Skilled Nursing Facility. The risk category has a multitude of structural implications throughout the design and construction of the building as well as fire and life safety considerations, which refer back to the structural requirements of the building. By way of example, Category III buildings have a higher design coefficient requirement, so when additional load is added, the structural components are increased significantly more as opposed to Category II buildings. One example of how the increased structural requirement can be met, is through increasing grade of lumber as well as narrower spacing between structural elements, which increases the amount of material required. In summary, the addition of dead load for a clay tile product (2.5 to 3 times that of composite shingles) further increases the required structural elements in a manner that would not be as impactful in a non-OSHPD building such as a similarly sized multifamily development that would be governed under risk category II.

Please let us know if you have any questions. We appreciate your consideration.

Sincerely,



Cliff Heeley, SVP of Business Operations, Principal