



January 31, 2025

To: Framing and Roofing Contractors in California

RE: The impact of Cal/OSHA's new fall protection regulations in residential construction

This letter is to inform the industry on the additional costs and time resources that will be necessary to comply with these new regulations that become **enforceable July 1, 2025**. The new regulation will affect framing operations on all single story structures, first floor perimeter framing and all interior framing of multi-story structures. The new roofing regulations will affect all roofing operations for all single story structures.

Framing:

Members of the California Framing Contractors Association, the Housing Contractors of California, and the Residential Contractors Association and key staffers have spent nearly 23 years in a battle with Federal OSHA over the landmark Cal/OSHA Title 8 regulation 1716.2 for residential framing activities. This regulation was developed with the input of the Carpenters Union, framing contractors, builders, and several experienced Cal/OSHA staffers. It provided a much clearer, safer, and enforceable regulation than the Federal fall protection regulations for residential framing construction.

When several of those Cal/OSHA staffers retired in 2022, Federal OSHA renewed their push to replace our regulation with theirs. Our coalition worked hard not to just replace 1716.2, but to get amendments to it that satisfy Federal OSHA enough to agree to them.

The coalition still tried to get the Cal/OSHA Standards Board to say no to any changes. At the August 20, 2024 Board meeting, the Board members all said they believed that the Cal/OSHA regulation was safer and better than the Federal regulation, but due to Federal OSHA threatening to take over construction enforcement from Cal/OSHA, they were forced to capitulate to Federal OSHA's demands. The federal revision of 1716.2 (a.k.a. 6 foot rule) will take effect on July 1, 2025.

Roofing:

The federal regulatory mandate for roofing has required revision to Cal/OSHA regulation, T8 Section 1731 New Production Type Residential Roofing. In essence, this change resulted in a lowering of the trigger height from 15 foot to 6 foot.



Impact on residential framing and roofing in California:

- Residential framing work will now require perimeter protection on the first story, instead of beginning at the second story along with Fall Protection Plans and added procedures for interior framing.
- Roofing fall protection will now be required on all roofs with eave heights above 6 feet.

Cost and time impact on projects for framing and roofing:

- The cost of fall protection of single family dwellings under the new regulations will likely double or triple.
- The addition of perimeter fall protection on the first floor of a two story home and single story home will require twice as much time and equipment to complete due to installing and deinstalling the fall protection equipment that was not required under the previous regulation.
- The schedule will be impacted substantially with the additional fall protection installation at the first floor on all structures.
- The interior fall protection plan requirements procedures and labor for framing will require more time for completion on all structures regardless of the number of stories.

Conclusion:

In light of these changes, please ensure you contact your clients and account for the additional costs and schedule impacts in all your upcoming projects. If you have any questions, please feel free to contact Bruce Wick or Kevin Bland.

Sincerely,

Bruce Wick

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Housing Contractors of California

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