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19-BSTD-03 2022 Building Energy Efficiency Standards Comments

Additional submitted attachment is included below.

From: [Fischer, Mike](#)
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The following comments are submitted on behalf of the Asphalt Roofing Manufacturers Association (ARMA) and are focused on the CEC staff presentation of September 1. Specifically, ARMA wishes to address the cool roof requirements and reroofing provisions being proposed for the 2022 standards.

ARMA has two items to address:

- ARMA is not opposed to the expansion of cool roof requirements into additional climate zones. The proposed standards revisions as described by the CEC staff presentation would retain the current performance values for solar reflectance but apply them to additional areas in California. This position should not be construed as acceptance or agreement with the technical justification for the proposed changes, including the projected energy savings and the estimated cost impacts.
- During discussions with the CASE teams on the subject of reroofing requirements, ARMA suggested that the definitions of reroofing, roof repair, roof recover, and roof replacement currently included in the California Building Code (CBC) be included in the Title 24 Part 6 standards. Because reroofing and related terms are defined in the CBC, and are used to delineate technical requirements for other requirements including wind uplift and fire resistance, ARMA proposes that the inclusion of the definitions and the proper use of terminology will streamline code interpretation and facilitate compliance.

The Asphalt Roofing Manufacturers Association (ARMA) is a trade association representing North America's asphalt roofing manufacturing companies and their raw material suppliers. The association includes the majority of North American manufacturers of asphalt shingles and asphalt low slope roof membrane systems.

Regards,
Mike Fischer



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