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ARMA Comments on Non-Residential High Performance Building Envelope

ARMA comments may be found in the attachment.

Additional submitted attachment is included below.



November 3, 2020

California Energy Commission
Re: 19-BSTD-03 Pre-Rulemaking

Thank you for the opportunity to comment on standards development for the 2022 Title 24 Part 6 Building Efficiency Standards. 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.

ARMA's comments focus on two specific areas related to the cool roof provisions of the proposed measures. First, we will address reroofing provisions. Second, we will comment on the recommendation to retain the current 2019 cool roof standards for non-residential high performance envelope.

REROOFING PROVISIONS

ARMA supports the addition of the definitions for roof recover and roof replacement in Part 6. Those definitions are consistent with the California Building Code (CBC) and provisions for reroofing therein. ARMA supports the use of consistent terminology due to the need for correlation among the various codes and standards for roofing materials across multiple construction codes in California.

Reroofing projects must comply with material provisions for wind uplift, fire resistance, and other requirements outside of building efficiency standards; the use of common definitions helps to ensure that potential conflicts are addressed. ARMA further supports the appropriate use of these definitions for the roof alteration provisions to improve the clarity of the standards, and the correlation between the energy efficiency standards and the roofing provisions in Chapter 15 of the CBC.

ARMA supports retaining flexibility in design and construction for energy efficiency of roof assemblies. Trade-offs of roofing reflectance and insulation requirements provide options to achieving energy efficiency goals for existing buildings without a reliance on prescriptive requirements. This flexibility is especially important for reroofing projects where it is unlikely other building elements will be included in the remodeling project.



COOL ROOF STANDARDS

ARMA provided comments to the statewide CASE team on August 21, 2020; our comments included a variety of concerns related to a recommended increase in the standards of cool roofing. ARMA does not oppose the CEC direction to add additional climate zones to the cool roof requirements while not increasing the performance levels across the rest of the state.

ARMA's comments included observations on market analysis, product availability, market share, and cost impact. The market analysis in the CASE report included assumptions on the preceding items that do not appear to be technically substantiated. Our concerns include a reliance on the CRRC database as evidence of market availability and the very limited market surveys conducted by the CASE team. We further believe the CASE cost impact data are incomplete and unsupported.

In our comments to the CASE team, ARMA noted the long-standing use of cool roofing technology as an energy efficiency strategy in California. ARMA believes that the modeled energy savings from prior standards should be validated. As stated in our comments:

“According to the California Department of General Services, the State owns or leases more than 270 million square feet of building space. In the years that cool roof provisions have been in effect it is likely that tens of millions of square feet of roofing have been replaced with cool roofs. It also seems logical that the California utilities are uniquely positioned to assess the energy savings associated with those reroofing projects.”

CONCLUSION

ARMA supports appropriate levels of energy efficiency that provide meaningful cost/benefit and retain flexibility in design and construction. The CEC staff presentation acknowledges the concerns we raised in our comments to the CASE teams. We encourage CEC to consider future research and analysis to validate energy savings outcomes from prior requirements before moving forward to implement additional measures.