

**DOCKETED**

<b>Docket Number:</b>	22-BSTD-01
<b>Project Title:</b>	2025 Energy Code Pre-Rulemaking
<b>TN #:</b>	250209
<b>Document Title:</b>	De Young Properties Comments - Opposition to higher reflectance and thermal emittance cool roofs
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	De Young Properties
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	5/18/2023 6:52:08 PM
<b>Docketed Date:</b>	5/19/2023

*Comment Received From: De Young Properties*  
*Submitted On: 5/18/2023*  
*Docket Number: 22-BSTD-01*

## **Opposition to higher reflectance and thermal emittance cool roofs**

De Young Properties is a production home builder in Central California. We have been built over 8,000 for nearly 50 years. We are deeply concerned with the proposal to increase reflectance and thermal emittance values for roofing materials as expressed on this webpage: <https://title24stakeholders.com/measures/cycle-2025/single-family-high-performance-envelope/> . Whether these increased values are just for projects attempting to take credit for "cool roof", or for any new construction project, we oppose this as the values are simply unrealistic when one factors in the different architectural styles the public requires us to build. If we built the same cookie cutter home, over and over again, and buyers would have no problem with this then this would not be an issue. Sadly, that is not reality. We urge you to not make these changes.

If you have questions, or would like further information from us, please contact me at [cbd@deyoungproperties.com](mailto:cbd@deyoungproperties.com) or 559-435-0900 ext. 115. Thank you!

Brandon De Young  
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