

*Comment Received From: Heather Estes
Submitted On: 8/30/2023
Docket Number: 22-BSTD-01*

Docket No 22-BSTD-01- Multifamily Envelope

Please see attached for GAF's comments in response to Docket No. 22-BSTD-01.

Additional submitted attachment is included below.



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August 29, 2023

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 22-BSTD-01
2025 Energy Code Pre-Rulemaking

Dear California Energy Commissioners and Staff:

By this letter, GAF is submitting comments on the 2025 Energy Code Pre-Rulemaking that includes cool roof changes into the Multifamily Envelope CASE Report, which was presented during the August 17th pre-rulemaking workshop.

Founded in 1886, GAF is the leading roofing manufacturer in North America. As a member of the Standard Industries family of companies, GAF is part of the largest roofing and waterproofing business in the world. The company's products include a portfolio of roofing and waterproofing solutions for residential and commercial properties.

GAF is concerned that this current proposal may have detrimental effects for homeowners and building owners, particularly as it relates to asphalt shingles, as these products are the most popular and cost-effective roofing system for single-family residential buildings in California. Several of the issues are described below.

Product Availability and Aesthetic Options

GAF is concerned that increasing the solar reflectivity requirements will limit product availability for asphalt shingles. The CASE Multifamily Envelope report cites the CRRC Rated Roof Product Directory as evidence of product availability. When in fact, the directory is a compiled list of tested products throughout the years, and not indicative of currently sold products within California. ARMA recently conducted a survey of California professional roofing material distributors and found a limited number of asphalt shingles with an ASR of 0.30.

Furthermore, the color palette of rated asphalt shingle options that can fulfill the proposed provisions is extremely limited. The change in roof radiative properties recommended in the CASE cool roof report is highly likely to restrict aesthetic options for asphalt shingles, a widely used and frequently preferred steep-slope roof option. Retaining the current reflectivity requirements for steep-slope multifamily buildings is recommended by GAF.

Alignment with Existing Provisions

The proposed change were presented as aligning with the 2022 Title 24 single family residential requirements for steep-sloped roof options, but it appears to align with the steep-slope nonresidential provisions. GAF is in support of maintaining the existing residential requirements of an aged solar reflectance of 0.20, a thermal emittance of 0.75, and a solar reflectance index of 16.

In summary, GAF recognizes and appreciates the efforts of the CEC staff and CASE team members to identify options that improve the energy-efficient design practices of California buildings; however, we oppose the proposal to increase the multifamily steep-slope reflectivity requirements. Retention of current requirements for steep-slope multifamily buildings is recommended.

GAF appreciates the opportunity to submit a public comment. Please feel free to reach out to me for further assistance or clarification. I can be reached by emailing heather.estes@gaf.com.

Respectfully submitted,



Heather Estes
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GAF