

DOCKETED

Docket Number:	22-BSTD-01
Project Title:	2025 Energy Code Pre-Rulemaking
TN #:	253159
Document Title:	Asphalt Roofing Manufacturers Association (ARMA) Comments - on Pre-Rulemaking Express Terms - Multifamily Envelope
Description:	N/A
Filer:	System
Organization:	Asphalt Roofing Manufacturers Association (ARMA)
Submitter Role:	Public
Submission Date:	11/16/2023 12:35:16 PM
Docketed Date:	11/16/2023

*Comment Received From: Asphalt Roofing Manufacturers Association (ARMA)
Submitted On: 11/16/2023
Docket Number: 22-BSTD-01*

Comments on Pre-Rulemaking Express Terms - Multifamily Envelope

Additional submitted attachment is included below.



November 16, 2023

California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: Comments on Docket 22-BSTD-01 – Pre-Rulemaking Express Terms

Dear California Energy Commissioners and Staff:

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 appreciates the opportunity to participate in the 2025 California Code of Regulations, Title 24, Part 6 standards development process and to offer comments on the Pre-rulemaking Express Terms. ARMA comments address proposed increases of roof product radiative property requirements for multifamily building new construction and additions.

As was previously expressed in our comments to the final CASE Multifamily Envelope report, ARMA remains concerned about availability of products which satisfy the proposed requirements for steep-slope roofs. The CASE report relies primarily on the Cool Roof Rating Council (CRRC) Rated Roof Product Directory for evidence of availability, but presence in the Directory does not ensure availability in any specific market area. This is reinforced by CRRC's inability to obtain samples of rated products during their annual Random Product Testing program in each of the past three years, leading to extremely high rates of product removal from the Directory.

To assist the California Energy Commission (CEC), ARMA conducted a survey of California professional roofing material distributors encompassing at least one hundred individual distributor locations. The survey results showed ready availability of products which meet current requirements (i.e., ASR of 0.20) and very limited availability of asphalt shingles with an ASR of 0.30, leading to an inference that availability of asphalt shingles meeting the proposed ASR of 0.25 will lie between those extremes. Therefore, we believe an assumption of ready product availability at an ASR minimum of 0.25 is not reasonable. ARMA believes compliant products are not as readily available as indicated in the final CASE report and recommends retention of the current requirements.

Roofing material distributors have experience with available aesthetic options that meet a solar reflectance of 0.25 or a solar reflectance index (SRI) of 23 due to reflectivity provisions for nonresidential steep-slope roofs which went into effect with the 2022 edition of the California Energy Code. This experience informed their responses to the ARMA survey, in which they expressed concerns about a substantially reduced palette of available colors associated with an increase in aged solar reflectance requirements.



The importance of aesthetics was acknowledged in the final CASE Multifamily Envelope report, which stated that builders have “concerns for consumer aesthetic preferences” and that manufacturers and designers see “the current trend in most U.S. steep-slope roofing markets is to construct with darker color materials”

An examination of rated products in the CRRC Rated Roof Products Directory can easily confirm that color options decline significantly with a move from an ASR of 0.20 to an ASR of 0.25. About 75% of asphalt shingles in the Directory which satisfy the proposed ASR of 0.25 are described as off white, bright white, gray, or tan. There are very few darker color options which customers prefer for the most economically advantageous steep-slope roofing product type. Retaining the multifamily steep-slope reflectivity requirements at current levels is recommended to preserve important aesthetic options which are desired by building owners.

In closing, ARMA appreciates the efforts of the CASE team and CEC staff to advance energy efficiency of California buildings. However, ARMA does not believe the proposed increases in the Pre-Rulemaking Express Terms are justified, and therefore, we encourage the CEC not to move forward with the proposed changes in roof radiative properties for multifamily buildings. Retention of current requirements for steep-slope roofs on multifamily buildings will support the continued adoption of reflective roofs in California by providing options which are economically and aesthetically attractive.

Sincerely,

A handwritten signature in black ink that reads "Aaron R. Phillips".

Aaron R. Phillips
Vice President of Technical Services