



June 29, 2006

Ms. Elaine Hebert  
Energy Specialist, Efficiency  
California Energy Commission  
1516 Ninth Street, MS-25  
Sacramento, CA 95814

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Dear Ms. Herbert:

As a licensed architect, past president of the Roof Consultant Institute and Registered Roof Consultant, I have had the opportunity to not only design hundreds of roof systems but to also observe and inspect a multitude of roof systems of varying age. There is no panacea for all roof conditions. As a designer I have specified the appropriate roof system for the building type and geographical location. As such, the idea of providing an exemption for the use of ballast to comply with the requirement for Cool Roofs is welcomed.

I am currently the technical consultant for the EPDM Roofing Association (ERA). Having traveled in some of the most inhospitably hot geographical areas of the world (Egypt, Jordan, Israel) and having extensive experience with ballasted roof systems, I have always intuitively felt that the shading factor provided by the ballast would be beneficial to the building environment. This is in concert with what much of the world, without air conditioning does, "shade the building, space or individual". Recent research and testing by Oak Ridge National Laboratories has concluded that some ballast configuration provide the same benefit as do more recognized cool roofing options such as single ply membranes.

ERA, supports the proposed Language For 2008 Title 24 to Subchapter 2, Section 118:

*EXCEPTION TO Section 118(i)1: For ballasted roof systems (as defined in SPRI/ANSI RP4), the ballast shall be made of either concrete pavers or stone, where the minimum stone size shall be number 4 (as defined in ASTM D448), and the ballast shall be applied onto the roof at a minimum rate of 15 pounds per square foot.*

Providing roof system designers with a Cool Roofing option that is self cleaning, non flammable, provides UV protection and provides a Class A rated roof assembly will not only provide design options, but as research supports this is the prudent direction for the CEC to move.

Thank you for your consideration of this concern.

Sincerely,

A handwritten signature in black ink that reads "Thomas W. Hutchinson".

Thomas W. Hutchinson, AIA, RRC, FRCI  
Technical Consultant, ERA

CC Bill Pennington, Ram Verma, and Mazi Shirakh