

ALEX ENGARDT ROOFING AND SIDING CO.

Curtis Gekas
California Energy Commission
1516 Ninth St., MS 25
Sac. Ca. 95814-5512

June 25, 2007

Re: Draft Sections 149(b) 1 B iv and 149 (b) v of the 2008 Building Energy Efficiency Standards: OPPOSE

Dear Mr. Gekas,

My purpose in writing this letter is to strongly register my opposition to the above Draft Provisions. I have over 28 years experience in the roofing industry and in built up roofing and I am the acting President of the Associated Roofing Contractors of Northern California. In my review of the above draft I can see significant problems with your statistics, and your proposed mandatory regulations to increase the R values of low sloped commercial buildings.

The assumption that someone has made regarding the number of buildings with existing insulation of R-19 or higher is way off the mark. I can tell you first hand that the majority of the roofs we deal with during normal reroofing operations have little or no deck insulation. To meet your guidelines would take the use of 3 ½" or more of rigid insulation board to achieve this standard and it simply can not be done on certain types of roof structures. This would cause huge costs to the building owners in raising of heat and air units, electrical and gas lines, skylights, roof mounted fans, chillers, cold box compressors, etc. This also can greatly effect the roof drains which would have to be raised going through concrete and block walls, etc. In some cases the building design simply can not accommodate changes in roof deck height where windows intersect walls, etc.

Under the new roof codes with the Title 24 provisions building owners have options to be compliant, and most understand the need and accept the cost increases, but with this new round of poorly drafted requirements you will have nothing short of a revolt with building owners refusing to pay double the cost to reroof a building, or possibly more when everything is figured into the mix. This will cause an increase in roofs done without permits by companies willing to circumvent these regulations and owners going along with it so save money that they should not have to spend in the first place. It will cause a lot of building owners to sit on properties with leaking roofs and do substandard repairs instead of roofing because they just do not have that cost in their budgets. It is difficult enough to make owners to go along with the new standards given the increase in cost, but this type of mandatory regulation will not work.

I urge the California Energy Commission to remove these provisions from the proposed 2008 Building Energy Efficiency Standards.

Thank you for your assistance and consideration.

Sincerely,



Thomas M. Lysaght