



July 5, 2018

CRA Members/To Whom it May Concern:

The Colorado Roofing Association [CRA] respectfully submits the following comments on the recommended changes to Denver's Green Roof Ordinance.

First and foremost, we want to get our contractors back to work in the City & County of Denver. The CRA represents over 275 members of which 160 are roofing contractors who do business in the City of Denver. Our members are licensed, insured, participate in continuing education, and provide on-going training to their highly skilled workers. We want them all back on the job in Denver.

CRA agrees with the position of the Denver Department of Public Health and Environment (DDPHE) and the Green Roofs Review Task Force (Task Force) in honoring the will of the voters by meeting or exceeding the benefits of the green roofs ordinance.

We are in support of the recommended changes to the Green Roof Initiative that are in the 06-15-18 Green Building Policy proposal including the proposed cool roof definitions. **However, we do not necessarily agree that cool roofs be required and feel they should be an OPTION to meet the green roof requirements on both new construction and more importantly reroofs.**

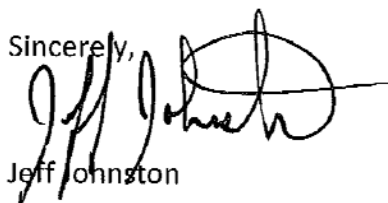
While cool roofs are a good option, Denver is in climate zone 5. As such, it is not part of the IECC cool roof requirement because heating and cooling costs are more equal in zone 5 than in lesser climate zones.

We are familiar with the benefits of cool roofs in the warm months, as we are with the benefits of black roofs during the cool months and prefer not to support one type over another. With that said, there are significant considerations for each type of roof and we want to ensure that we are inclusive of all types of cool roofs with provisions to help mitigate any condensation issues

As an association we represent our local industry including manufacturers and installers of all types of roofing and as such we do not take a stance for one type over another. We are appreciative of being included in the process in formulating the new Green Building Policy and agree that changes need to be made to the current Green Roof Initiative so our members can get back to work within the City and County of Denver.



We plan on providing education to our members to assist them with green roofs and cool roofs along with coatings and waterproofing. We want to familiarize our members with the eventual Green Building Policy that passes city council and would like to remain active with the City & County of Denver to assist in policy and code changes that affect our industry.

Sincerely,  


Jeff Johnston

President, Colorado Roofing Association

CEO, The Roofing Company