



Position of the Roofing Community

The roofing community in Denver supports 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 as written in the text on the ballot and in the longer form full text ordinance.

The City & County of Denver Building Codes Review Committee rejected a reflective roofs proposal in March of 2015 (and the City Council supported that decision in a vote in March of 2016).

Reflective roofs are an appropriate choice in some climates and for some buildings. Reflective roofs are often an appropriate choice in ASHRAE Climate Zones 1-3, but can have unintended consequences in northern climate zones like Denver and therefore should be left to the designers and owners choice. Reflective roofs in new and existing buildings in climate zones 4 and above need to be very thoughtfully designed by a qualified design professional to reduce the occurrence of unintended consequences and therefore should not be mandated in climate zones 4 and above. Retrofitting an existing building with a reflective roof may require replacement of the entire roofing assembly.

Ask

The mandate for cool roofs (reflective roofs) should be removed in the Proposed Modified Ordinance (PMO) for both new buildings and existing buildings. The PMO should be viewed through the lens of a model green standard or building code, similar to the IGCC, ASHRAE 189.1 or LEED standards which offer a **performance-based path of several options** rather than a prescriptive path. The roofing community is in support of all other components of the PMO.

Background

The commercial roofing community feels that it has been shut out of this process. Various members of the roofing community, including individual roof consultants and roofing contractors, have asked to be on the task force, have asked to make presentations, and have raised concerns about the cool roofs portion of the PMO. The roofing community submitted extensive comment and attended meetings. The requests to address the task force have been denied or **the roofing community has been told that the cool roofs mandate is not up for discussion.** It should be noted that the original text did not reference reflective roofs or cool roofs in any way.

Also of concern is the urgent timeline. The Task Force appeared to have made a firm decision to require reflective roofs in the modified proposed ordinance BEFORE the draft was even released for public comment on May 3, 2018. There were only 11 working days between the release of the proposed modified ordinance and the informal deadline for submission to Task Force members and only 20 days until the final deadline. With only one meeting of the task force remaining after the final deadline, and the possibility for significant public comment, we believe it was extremely difficult for the Task Force to have an ample opportunity to review and digest such complex information. The final version of the PMO that includes the cool roof mandate was only presented to the public on the same day that the Task Force took their final vote. **For that reason, the roofing community is continuing to raise these issues.**