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Date: 3/26/2008 7:21 PM
Subject: P0524emo20080326-149_base-flashing-language
Attachments: 149-Exception-language1.pdf

Charles: Well I feel it is time to speak up again on the 149 Exception language on behalf of ARMA and myself as a roof consultant. The language is still not clear and does not really address the issue at hand, which is to maintain 8-inch high base flashings. Instead it focuses on a sub-set of limited issues.

As it reads right now, it will be unacceptable and challenged in my opinion. Attached is a summary of comments and my recommended change.

Sincerely,

Pacific Building Consultants, Inc. (PBC) and Technical Roof Services, Inc. (TRS)

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DOCKET	
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CEC Proposed language as of 03/25/08

If mechanical equipment is located on the roof and it will not be temporarily disconnected and lifted as part of the roof replacement and if the height from the roof membrane surface to the top of the base flashing is equal to or less than 8 inches (203 mm), then additional insulation is not required. ~~If the thickness of the insulation required in Table 149-A reduces the height of curbs to less than 4 in., the insulation thickness may be reduced to maintain a curb height above the finish roof of at least 4~~

Comments: I've been waiting for the dust to settle with other parties, to try their hand at straightening out the exception language. As a roof consultant having to deal with this, compound, multi-level dependent criteria is ridiculous. On behalf of ARMA and consultants like myself, I recommend the following "simply put" change

Simply put –

Exception: Any work that causes roof covering base flashings to fall below 8-inches is excepted and not required.

Exception 2 as proposed is still not correctly worded. The statement is myopically focused on addressing only equipment on the roof and not the primary focus which is: the preservation of the minimum 8-inch high base flashing.

Roofs have penthouses, elevation changes, architectural features and importantly, the parapet wall or an area separation wall that is an extension of a fire rated wall from below the deck that needs to have a certain height above the membrane with a portion required to be non-combustible surfaced. These generic items (and I'm sure there are probably others that escape me), need the same consideration for the **preservation of the 8-inch high base flashing** as the mechanical references being proposed.

I recommend you use the "Simply Put" emboldened "Exception" version stated above.

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