



## MEMORANDUM

To: The Honorable President and Members of the Baltimore City Council  
c/o Natawna Austin, Executive Secretary

From: Alice Kennedy, Acting Housing Commissioner

Date: November 28, 2021

### Re: City Council Bill 21-0160 Building Code – Cool Roofs

The Department of Housing and Community Development (DHCD) has reviewed City Council Bill 21-0160 for the purpose of requiring newly constructed buildings and additions to existing buildings partly financed using City funds to adhere to specified roofing requirements; authorizing certain exceptions; and generally relating to the installation of Cool Roofs.

If enacted, City Council Bill 21-0160 would amend Section 2-103 of the International Building Code (IBC) and Section 10-102 of the International Residential Code (IRC), within Baltimore City's Building, Fire and Related Codes (BFRC), to require newly constructed buildings and additions to existing buildings, partly financed using City funds to adhere to new "cool" roofing requirements. A cool roof is designed to reflect more sunlight than a conventional roof, absorbing less solar energy, thus lowering the temperature of the building and increasing the ability to shed heat.

DHCD is already encouraging the installation of cool roofs when working with homeowners in need of a roof repair or replacement who are participating in our Housing Rehabilitation and Repairs Program in the agency's Office of Homeownership and Housing Preservation. Additionally, newly constructed buildings and additions to existing buildings, whether privately financed or partly financed by City funds, are required to adhere to the standards laid out in the BFRC, which includes the International Green Construction Code (IGCC) which applies to construction requirements intended to reduce the negative impacts and increase the positive effects of the built environment on the natural environment and building occupants.

The Bill would amend Section 2-103 of the BFRC allowing the city to modify the International Building Code (IBC) related to "Roof Assemblies and Rooftop Structures" (Sections 1503 to 1509) to set certain performance requirements for reflective standards on any roof covering over conditioned spaces on low-slope roofs with a roof slope of < 2:12, on newly constructed buildings and additions to existing buildings, to be energy star rated as highly reflective.

The Bill similarly amends Section 10-102 of the BFRC allowing the city to modify the International Residential Code (IRC) related to "Roof Assemblies" (Sections 901 to 908) to set requirements for reflective roof coverings over conditioned spaces on low-slope roofs with a roof

slope of < 2:12, on newly constructed buildings and additions to existing buildings, to be energy star rated as highly reflective.

Council Bill 21-0160 would require newly constructed buildings and additions to existing buildings that are funded by the city to adhere to new “cool” roofing requirements that may reduce the heat island effect. The purpose clause refers to projects “partly financed using City funds,” it is unclear how “partly financed” is defined and who would be making that determination. DHCD staff would have no way of knowing how a project is funded and if any funds were provided by the City when reviewing a permit application. DHCD would recommend additional clarification around what would trigger this requirement or remove the financing requirement all together. Overall, this legislation is a friendly modification to the family of codes that make up the BFRC and may help residents save money with energy costs, reduce energy consumption, improve comfort and benefit the environment.

DHCD **does not object** to the passage of City Council Bill 21-0160.

*AK/sm*

*cc: Ms. Nina Themelis, Mayor’s Office of Government Relations*