



January 30, 2026

Honorable Thomas W. Peterson
Utah House of Representatives
PO Box 357, Brigham City
UT, 84302

WWW.IIBEC.ORG

Dear Representative Petersen,

On behalf of the International Institute of Building Enclosure Consultants (IIBEC), an association of design professionals specializing in building enclosure projects, I respectfully submit our concerns regarding H.B. 65, Construction Code Amendments.

IIBEC is an international association representing 3,900 professionals who specialize in roofing, waterproofing, exterior wall design, and building enclosure commissioning. Our members serve as trusted advocates for building owners, ensuring projects meet applicable standards, codes, warranties, and performance expectation.

We are particularly concerned that the new exception to Section 1512.2 of the IBC and Section 705.2 of the IEBC will allow existing layers of polyisocyanurate insulation to remain in place during certain roof replacements. While well intentioned, this language poses several risks.

Allowing existing insulation to remain in place without more specific evaluation criteria may result in inconsistent enforcement and place undue responsibility on contractors and inspectors to make determinations that are inherently subjective. For example, without specific evaluation criteria, who determines if the roof deck is in “serviceable” condition? Likewise, who determines whether the existing insulation is “deteriorated”? This could increase liability exposure and ultimately lead to higher long-term costs for building owners due to premature failures, warranty disputes, or future remediation efforts.

In practice, the condition of existing insulation is difficult to accurately assess without removal. Polyisocyanurate insulation can retain moisture internally without obvious visual indicators, leading to concealed degradation, reduced thermal performance, and an increased risk of mold growth. Retaining compromised insulation can also negatively impact overall roof system performance, shorten the service life of the replacement roof assembly, and may also void or negate manufacturer warranties, leaving building owners without critical long-term protections.

At present, this issue is being discussed at multiple levels within the industry to address the concerns outlined above while balancing fiscal prudence with the need to protect public health, safety, and welfare.

For these reasons, IIBEC respectfully recommends that the legislature pause further action on this provision until the industry has had sufficient opportunity to develop a consensus-based solution.

Thank you for the opportunity to provide input on this important matter. Please do not hesitate to contact us if additional information or technical expertise would be helpful as you continue your deliberations.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian", with a stylized flourish at the end.

Brian Pallasch, CAE
Executive Vice President & CEO