



April 14, 2025

To the California Air Resources Board:

On behalf of the 3,700 members of the International Institute of Building Enclosure Consultants (IIBEC), please accept these comments regarding the March 13, 2025 California Air Resources Board's (CARB's) Building Embodied Carbon workshop.

IIBEC is an association of design professionals, including architects, engineers, and consultants, who specialize in building enclosure projects. IIBEC members design, investigate, and manage roofing, exterior wall, and waterproofing systems and projects. IIBEC members act as advocates for the building on behalf of the owner or manager and ensure the building enclosure or roofing projects meet standards, codes, warranty requirements, and performance requirements.

High-performance building enclosures are designed to save owners (public and private) money over the life of the buildings. These enclosures reduce energy costs, increase occupant comfort, and remain cooler longer when power is disrupted. They are also subject to—and must resist—extreme structural loading, weather, and fire. As CARB implements AB 2446 and AB 23, it is important to maintain the ability of building enclosure consultants to choose the products that best meet all of the performance requirements of the project. IIBEC members are concerned that these requirements may limit their ability to choose the appropriate products to meet the myriad of performance requirements of a building.

If IIBEC can be of any service going forward, please do not hesitate to reach out.

Sincerely,

Brian Pallasch, CAE
Executive Vice President & CEO
Raleigh, NC