



5/25/2022

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Managing Director
Washington State Building Code Council
1500 Jefferson St. SE
P.O. Box 41449
Olympia, WA 98504

Todd Beyreuther
Technical Advisory Group, Washington State Building Code Council
PO Box 41449
Olympia, WA 98504

Dear Mr. Bumbalov and Mr. Beyreuther,

We are strongly concerned with the proposal currently before the International Building Code (IBC) and International Existing Building Code (IEBC) Technical Advisory Group (TAG) Members of the State Building Code Council (SBCC), regarding greenhouse gas emissions on the manufacturing of concrete and steel.

The Association of Washington Business (AWB) is Washington's oldest and largest statewide business association, with nearly 7,000-member companies, including many who will be directly impacted by this proposal. AWB serves as both the state's chamber of commerce and the manufacturing and technology association.

Setting aside the question of whether the SBCC has the authority to impose such a policy, (we believe it does not), we want to highlight the potential impacts of capping emissions on the manufacturing of concrete and steel.

The proposal will drive up the price for all commercial, residential, and public works construction projects across the state. This would be at a time when Washington employers are already facing record growth in inflation, fuel prices, and other volatile supply chain constraints.

The "pass through" cost implication made by proponents is false. There will be significant implementation costs, as well as material, price, and other market adjustments that will impact the concrete and steel industries across the state and likely passed on to each project.

Discriminating against steel and concrete will also create competitive advantages for alternative materials, thus leaving the SBCC in the position of providing preferential treatment to certain construction products.

There is also a range of uncertainty on how the proposal would affect the performance of steel and concrete in various construction uses including its fresh and hardening properties, early and long-term strength gain, durability, mix feasibility, life cycle maintenance, set times that affect project scheduling, compatibility with other materials, etc.

In recent years, the Washington State Legislature has considered but rejected similar proposals like Buy Clean and other prescriptive procurement alternatives to reduce greenhouse gas emissions in building materials. In 2021, legislators instead created a work group to study these strategies. That group has been meeting and is required to provide a report and recommendations to the legislature by June 30, 2022.

We recognize that the SBCC performs important work with creating safe, fair, and standard building practices, but this proposal goes too far, with too many uncertainties, and exceeds the Council's authority. It also ignores the work of the legislature and input from impacted stakeholders. We urge the SBCC to consider these ramifications and reject the proposal.

Sincerely,

AKU Enterprises, LLC
American Institute of Steel Construction
Associated General Contractors
Association of Washington Business
Bricklayers and Allied Craftworkers Local 1
WA/AK
Building Industry Association of Washington
CalPortland
Campbell's Lodge, Inc.
Cascade Concrete Products Co Inc.
Cascade Natural Gas Corporation
GCP Applied Technologies
Greater Spokane Valley Chamber of Commerce
Holroyd Co Inc
Horenstein Law Group, PLLC
Industry Erectors Inc. DBE / MBE
Iron Workers Local Union 86
Ironworkers Dist. Council of the Pacific Northwest
Ironworkers Local 29
Ironworkers Local 86
Landau Associates
Landed Gentry Development, Inc.
Lehigh NW Cement Company
Lewis Clark Valley Chamber of Commerce
MacKay Sposito

Masonry Institute of Washington
Moses Lake Chamber of Commerce
NAIOP Washington State
National Ready Mixed Concrete Association
Northwest Cement Council
Northwest Concrete Masonry Association
Northwest Gas Association
Nucor Seattle
NW Hearth, Patio & Barbecue Association
Oldcastle APG, A CRH Company
Operative Plasterers & Cement Masons Local 528
Pacific Propane Gas Association
PNW Reinforcing, Inc.
Pullman Chamber of Commerce
Schweitzer Engineering Laboratories
Sky Valley Chamber of Commerce
Smokey Point Concrete
Sutton Trucking LLC
The Washington Retail Association
Tri-City Regional Chamber of Commerce
WA Aggregates & Concrete Association
WA Air Conditioning Contractors Association
Washington Food Industry Association
Washington Forest Protection Association
Washington Trucking Associations