

May 24, 2022

Stoyan Bumbalov

Washington State Building Code Council
1500 Jefferson Street SE
Olympia, WA 98504

Dear Mr. Bumbalov and members of the Building Code Council Technical Advisory Group:

On behalf of the Ironworkers District Council of the Pacific Northwest and our member unions, we are writing today in opposition to the proposal before the Building Code Technical Advisory Group (TAG) submitted by the New Buildings Institute (NBI): “Greenhouse Gas Emissions Reductions for Steel Products” and “Concrete Greenhouse Gas Emissions Reductions.” We oppose the proposal for the following reasons:

We oppose any proposal that picks winners and losers.

The current proposal before the TAG creates onerous regulatory environmental declaration requirements on concrete and steel, while exempting wood, glass and aluminum. This will undoubtedly create an unfair advantage for certain materials over others as architects and builders consider which building products to use.

Serious safety concerns.

Again, as architects and builders are forced to choose products with less regulatory requirements to streamline project timing, products without the long-standing structural safety record of steel and concrete will end up being favored. We’ve already witnessed the consequences of relaxed safety standards through unfortunate building collapses in our neighboring states. Workers and members of the community deserve safety.

Additional and lopsided regulatory requirements increase costs for taxpayers.

The proposal before TAG will increase costs as companies scramble to meet increasing requirements in an economy that is already battered by inflation and serious supply chain issues.

Lack of stakeholder input blindsides legislative work.

As an organization, we’ve been collectively blindsided by this proposal. We have no record of being contacted for input, nor have any of our member unions been contacted. At the same time, we have been working in good faith with all stakeholders on “buy clean-buy fair” proposals before the legislature. This proposal threatens progress on those efforts.

In closing, we ask that this proposal be tabled immediately to allow time for stakeholders and state legislators to continue the essential work that is already underway.

Thank you for your attention to this important matter.

Steve Pendergrass, President of the Ironworkers District Council of the Pacific Northwest

Chris McClain, Business Manager, Ironworkers Local 86

Jason Fussell, Business Manager – Ironworkers Local 29