

State of
Washington
House of
Representatives



January 15, 2025

Washington State Building Code Council
sbcc@des.wa.gov

Dear Members of the SBCC:

The Washington State Building Code Council (SBCC) is currently considering adopting an appendix to the state building code (24-GP1-118-R4) that would establish methods to measure and reduce the embodied carbon impact of building materials over the course of a building's life. The proposed amendment aligns closely with the *Recommendations for Washington State Embodied Carbon Code Language*, a report commissioned by the SBCC in accordance with Senate Bill 5950 Sec 151 (15), effective March 29, 2024.

As members of the Washington State Legislature that have supported policies to reduce the carbon footprint of building materials, this letter seeks to clarify how the SBCC proposal is a helpful addition to the broader work and express support for the SBCC amendment. If adopted, this proposal would contribute to a growing portfolio of embodied carbon policy efforts in Washington state. In March 2024, HB 1282, the Buy Clean Buy Fair Washington Act, was signed into law to reduce embodied carbon in the built environment, improve human and environmental health, grow economic competitiveness, and promote high labor standards in manufacturing. This proposed appendix would complement, rather than undermine, HB 1282 by building upon the intent of the legislature to move toward embodied carbon policy in all buildings, not just state-owned buildings.

The SBCC proposal is also aligned with numerous other Washington-led efforts to reduce greenhouse gas emissions, including in building materials: the Climate Commitment Act, the Pacific Coast Collaborative's [Low-Carbon Construction Task Force](#), [Executive Order 20-01](#), and specific actions in the [2021 State Energy Strategy](#).

Importantly, the proposed amendment supports emission reductions in sectors such as industrial manufacturing that are critical to achieving the 2050 net-zero emission targets mandated by RCW 70A.45.020. While HB 1282 and other efforts to address embodied carbon are important, additional, accelerated action is needed to meet legislatively mandated emissions reductions. Code-based policies are critical to meeting such targets because they most directly impact decisions early in the design and construction phase where 80% of a building's embodied carbon impacts occur.¹ Addressing embodied carbon in the design and construction of buildings presents an urgent and valuable opportunity to reduce carbon emissions in Washington.


¹ Benke, B., Roberts, M., Lewis, M., Shen, Y., Carlisle, S., Chafart, M., and Simonen, K. (2024). The California Carbon Report: Six Key Takeaways for Policymakers. Carbon Leadership Forum, University of Washington. Seattle, WA. <https://carbonleadershipforum.org/california-carbon/>

Beyond carbon, this code proposal has the potential to safeguard the public from hazards associated with the creation of building materials, furthering the efforts to improve human and environmental health outlined in HB 1282. Specifically, this code proposal would accelerate emission reductions in the extraction, manufacturing, and transportation of building materials, which can improve air quality and public health in communities located near industrial centers and manufacturing facilities. The proposed carbon accounting also provides recognition and enhances competitiveness of Washington manufacturers and producers that have already made investments in strong environmental standards.

The proposed code amendment would put into action the strong foundation and clear direction that Washington state has set on reducing embodied carbon in the built environment. The proposal includes three compliance pathways to provide flexibility for project teams and draws heavily on precedent – specifically the latest version of CALGreen, California’s statewide building code that is currently in effect. These pathways are realistic and achievable for project teams and would prove critical in reaching the state’s 2050 emission reduction goals.

The Washington State Building Code is a valuable and legitimate mechanism through which substantial carbon reductions can be achieved. For this reason and those outlined above, we urge the SBCC to consider and adopt 24-GP1-118-R4 for the benefit of all Washingtonians.

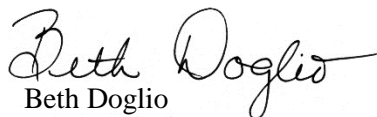
Thank you,



Davina Duerr
State Representative
1st Legislative District



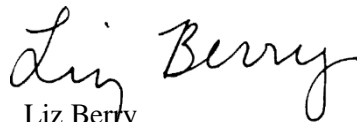
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