

WACA SBCC Comments RE: 24-GP1-118 | 4.11.2025

The Washington Aggregates & Concrete Association (WACA) remains steadfast in our interest in continuing to follow the lead of industry in achieving the carbon reduction goals that have been established respectively by the Concrete, Cement and Aggregate Industries. We also maintain that aspirational carbon reduction goals are a procurement matter and should be encapsulated within the design build process and held with the owner(s), engineers and designers of the project. Numerous projects support the idea that when open discussions are held, these projects meet or exceed carbon reduction goals without the need for pathways, regulations or mandates.

More importantly, we would argue that the current proposal before the State Building Code Council (SBCC) known as 24-GP1-118 is not a matter of Health and Safety as set forth by [RCW 19.27.020](#) and believe that the SBCC is out of their current legislative authority and scope in considering this as any part of the State Building Code.

Justification:

[RCW 19.27.020](#) states the purpose and authority is to promote the **health, safety** and welfare of the occupants or **users of buildings and structures and the general public** by the provision of building codes throughout the state. Accordingly, this chapter is designed to effectuate the following purposes, objectives, and standards:

- (1) To require minimum performance standards and requirements for construction and construction materials, consistent with accepted standards of engineering, fire and **life safety**.

To define **LIFE SAFETY** in relation to building code In building code, "life safety" refers to the design and operational features within a building that are intended to provide occupants with a reasonable level of safety during emergencies like fires, including elements like fire alarms, exits, fire suppression systems, proper construction materials, and clear evacuation routes, all aimed at minimizing potential injuries and fatalities during an emergency

To define **HEALTH** In the context of building codes, "health" refers to the well-being of building occupants, encompassing aspects like indoor air quality, access to natural light, appropriate ventilation, and the use of non-toxic materials, all aimed at minimizing potential health risks associated with the built environment and promoting a comfortable living or working space; essentially, building codes strive to protect the health of people inside a building by setting standards for factors that could impact their physical and mental well-being.

To define **GENERAL PUBLIC** In the context of building codes, "general public" refers to any individual who could potentially occupy or use a building, meaning the broad population that building codes are designed to protect through ensuring safe construction standards, regardless of their specific relationship to the building owner or developer; essentially, anyone who might enter a building is considered part of the "general public" that building codes aim to safeguard.

Neither life safety, health or general public extend beyond the built environment and are limited to the scope of the experience within the building. None of this is under the scope of global environmental impact or relating specifically to Embodied Carbon.

- (2) To require standards and requirements in terms of performance and **nationally accepted standards.**

There is currently no standard in nationally accepted building standards for embodied carbon reduction.

To reference [RCW 19.27.032 \(d\)](#) "The council may adopt or amend the state building code or code sections at any time pursuant to legislative direction as reflected in legislation signed into law."

We would argue that there is currently no law that includes Embodied Carbon Reduction as a purview for SBCC to consider.



The scope of the 2024 budget proviso that authorized the study which generated this code proposal was fulfilled when the report and recommendation was presented to legislature in December of 2024, and any further action by the SBCC is a misapplication of authority.

Justification:

The study that was conducted for the State Building Code Council (SBCC) as per the proviso in Section 151 (15) in the 2024 Supplemental Operating Budget ([Engrossed Substitute Senate Bill 5950](#)), did not extend authority to the SBCC for code adoption, but instead gave leave for SBCC's contracted researchers to make recommendations for potential language for legislature to consider. It would then be up to legislature to determine if further authority is warranted that would then provide for potential further direction to the SBCC – Hence [HB 1458](#) which failed to pass this year.

This legislation would have allowed the SBCC authority to consider embodied carbon reduction goals in the state building code, but it failed to pass. Therefore, WACA maintains that these continued discussions are outside the SBCC's legislative authority and scope.

We believe that Embodied Carbon policy and research needs to take place with the [2ESHB 1282](#) EPD working group as authorized by Legislature. [2ESHB 1282](#) refers to the "department" as the Department of Commerce and requires that the department convene a working group to evaluate EPD's for building materials as this is a procurement matter and not a health and safety matter.

This carefully crafted working group will examine the EPD process for each building material in relation to Washington State and the unique importation and resource procurement challenges this state faces and we believe will generate a more relevant, successful, fair and balanced approach to achieving carbon reduction in the State of Washington.

We also believe that to adopt this proposal into the code appendix will only slow progress, fuel confusion with local jurisdictions, potentially tip the balance in the materials market, and perpetuate a false sense of moving the carbon reduction needle while potentially doing more damage than good.

Therefore, our conclusion is that the current efforts of the SBCC to push 24-GP1-118 forward are outside the current legislative authority given to the SBCC and we prefer that this discussion be referred to the working group established through the Department of Commerce where procurement discussions belong. We want to note that we are actively participating in that working group and we are at the table with data. We are prepared to discuss solutions, and we look forward to working with stakeholders, interested parties and various interest groups in that format as we seek to achieve industry's goal of global embodied carbon reduction in the built environment.

We ask that the SBCC table this proposal and let the good work being done with the Department of Commerce continue as it is intended to make informed and collaborative recommendations to Legislature. We look forward to the collaborative and industry endorsed solution coming out of that working group as we work to achieve carbon reduction in the built environment.

Sincerely,

Cory LeeAnn Shaw

Executive Director

WA Aggregates & Concrete Association

WA ACI Chapter