



June 23, 2025

Washington State Building Code Council and BFRW Committee

sbcc@des.wa.gov

Re: NBI Comments to BFRW Regarding Embodied Carbon Appendix

Dear Members of the SBCC and BFRW Committee,

As the proponents of the original embodied carbon code appendix proposal 24-GP1-118-R4, New Buildings Institute (NBI) is writing to express its support for the continued work by the BFRW Committee to gather and reconcile public comments into a new draft, per the direction provided at the 2/6/25 SBCC hearing.

In light of the more recent comments and conversation regarding the proposal, we offer the following reactions and high-level direction that NBI supports, for the Committee's consideration.

Scope and Purpose: By voting unanimously to move this proposal forward, the SBCC endorsed the notion that embodied carbon provisions have a place in the state building code, and warrant consideration by the full code council. It directed the BFRW Committee to shift its focus away from the existential question of where these provisions belong and instructed the committee to focus on the technical substance of the proposal.

NBI is of the view that these provisions – which address material quality and impacts to public health – fall within the stated purpose of Washington's Building Code to "promote the health, safety and welfare of the occupants or users of buildings and structures and the general public," specifically through the use of "minimum performance standards and requirements for construction and construction materials" ([RCW 19.27.020](#)).

Addressing the polluting impacts of the manufacturing of materials and construction of buildings helps safeguard the public from the hazards associated with the creation of building materials. This entails reporting on and reducing the pollution resulting from the extraction, manufacturing, and transportation of these products, which can improve air quality and public health in communities located near industrial centers and manufacturing facilities.

Compliance Pathways: NBI urges the BFRW to maintain the three compliance pathway options presented in our draft. This framework is broadly preferred by industry and project teams for the flexibility that it provides. Throughout this code development process, including at the latest 6/13/25 BFRW Committee meeting, we heard that ensuring equity among covered materials and product types is a priority. Abandoning the product-level compliance pathway altogether runs the risk of lending preference to the products for which the building-level compliance option is easier to pursue. In addition, these two pathways do not work in isolation. The quality of whole building LCAs depends on the quality of EPDs in the market; maintaining the product-level pathway will help to improve the number and quality of EPDs in Washington's market, so that they may better inform building-level assessments in the long run.

Support for Other Submitted Comments: Throughout the code development process, NBI has received extensive input on our draft from SBCC and IBC TAG members as well as from industry groups and embodied carbon experts. We have appreciated the opportunity to refine our draft to accommodate the substantive feedback we have received. Our aim has always been to arrive at a draft that is broadly agreeable and workable, while moving the state closer to reaching its climate goals.

In this spirit, NBI is supportive of the technical changes that have been submitted by the Carbon Leadership Forum (CLF), Northwest Concrete Masonry Association (NWCMA), and American Institute of Steel Construction (AISC), all of whom commented on the latest draft being considered by the BFRW. Regarding AISC's request to include GWP values for mass timber products in Table Q103.3.1, NBI recommends utilizing the values in CLF's newly published [2025 Material Baselines Report](#).

Finally, it is worth highlighting the fact that the proposed appendix would be available as a voluntary section for jurisdictions who have the desire and capacity to implement these provisions. The appendix includes options for greenhouse gas reduction limits but does not impose any on the adopting jurisdiction; our goal is to equip jurisdictions with the tools and language to allow them to set appropriate limits for their unique conditions.

Thank you in advance for your consideration of these comments, and we look forward to continuing to collaborate with you on this effort.

Thank you,

Ariel Brenner, Project Manager

Amie Lewis, Associate Director

New Buildings Institute