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Council Members: Kjell Anderson, Jay Arnold, Todd Beyreuther, Justin Bourgault, Tom Handy, Angela Haupt, Roger Heeringa, Tye Menser, Benjamin Omura, Peter Rieke, Katy Sheehan, Dan Young.

Ex-Officio: Lorin Lathrop, John Lovick, Alex Ramel, Suzanne Schmidt, Shelly Short.

Building, Fire, Residential and WUI Codes (BRFW) Committee: Roger Heeringa; Chair, Daimon Doyle, Dan Young, Todd Beyreuther, Angela Haupt, Katy Sheehan.

sbcc@des.wa.gov (Submitted Electronically)

RE: Joint Stakeholder Letter #2 – Concerns Regarding Proposal 24-GP-118-R4-BRFW & WBLCA Pathway

We respectfully submit this letter to express our continued opposition to Proposal 24-GP-118-R4-BRFW (proposal). We remain committed to our position that aspirational carbon reduction goals do not belong in health and safety considerations for building occupants and code and therefore this proposal is outside the purview of the SBCC to consider.

We also write with the intent to provide comments regarding the associated 24- GO-118-R4 WBLCA Pathway (pathway) document that was brought forward by the BRFW Committee on June 13, 2025.

As leading trade associations and professional organizations in Washington, we are united in our commitment to responsible code development that aligns both environmental goals and practical implementation across the built environment.

Process Concerns Regarding 24-GP-118-R4-BRFW

Prior to June 13, 2025, the proposal was developed, and all drafts were managed solely by New Buildings Institute (NBI) and Carbon Leadership Forum (CLF), who also collected and evaluated public input independent of the BRFW Tag and the State Building Code Council (SBCC). They also submitted new drafts each hearing, often the public did not see the draft prior to the hearing. This process lacked transparency, formal comment mechanisms, and balanced stakeholder engagement. Comments submitted were not reviewed or acted upon by the BFRW TAG, and no formal process was in place to ensure fair consideration.

While we appreciate that the BFRW now controls the draft language, the flawed procedures to date necessitate that this document be rejected. We respectfully request this proposal cease to proceed any further. Any revised language for future proposals will be submitted with balanced stakeholder involvement through the legislative process and the next adoption cycle.

Recommendations

1. **Consider the June 12, 2025, Coalition Opposition Letter** and do not advance the current code language or any alternatives to the full Council.

If the BFRW declines to pause the process, we urge the following pathways be considered prior to submittal to SBCC for full consideration:

2. **If not adopting item 1:** Refer to the attached “24-GP-118-R4 WBLCA Pathway” alternative proposal as the document to move forward, which removes the prescriptive compliance option that was presented at the June 13th BFRW meeting. If forwarded to the SBCC, we recommend inclusion of language allowing for optional operational energy calculations through the use phase of the structure as part of the considerations in this pathway proposed language. The BFRW should also consider the incorporation of ASTM E2921 Standard Practice for Maximum Criteria for Comparing Whole Building Life Cycle Assessments for Use with Building Codes, Standards, and Rating Systems.
3. **If not adopting items 1 or 2,** the proposal should only be advanced with these modifications:
 1. The code must include a provision related to the prescriptive approach which requires the following:
 1. The Adopting jurisdiction, prior to adopting the prescriptive approach, must survey the regional producers of concrete, cement, steel and wood products to determine if those producers can meet the reduction targets below the baseline.
 2. If the producers representing more than 25% of the production by volume in a region cannot meet the reduction targets, then the prescriptive pathway in the code cannot be implemented.
 2. The code for the prescriptive pathway must include regional data of the material baseline embodied carbon contents. The baseline data must be chosen from the physical boundaries of the adopting jurisdiction at a minimum and may not be greater than 3 times the physical area (by boundary) if surrounding areas are included.
 3. The code must include a clause that allows for an exemption from the rule during situations where low-embodied carbon materials are not materially available in the marketplace. The code must outline an exemption process.
 4. The code must include a provision for situations where the building materials that have been placed in a structure do not meet the reduction targets. This provision cannot include requirements to remove and replacement of materials.

We remain committed to working collaboratively toward carbon reduction goals, but the process must be equitable and technically sound.

Sincerely,

(Logos of coalition on page 3)

For questions, please call:

Cory LeeAnn Shaw

Executive Director

WA Aggregates & Concrete Association | WA ACI Chapter | WACA Emerging Leaders Fund

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