

State of Washington
State Building Code Council (SBCC)

June 23, 2025

Written comments for code change [proposal 24-GP1-118](#)

The Carbon Leadership Forum (CLF) supports code amendment proposal “24-GP1-118-R4”, which establishes a voluntary code appendix with three compliance pathways for reducing embodied carbon. We believe this proposal will help Washington State meet its greenhouse gas reduction goals and is feasible to implement.

We have attached “tracked” comments on this proposal, aiming to address some of the concerns raised during the June 13th meeting about the product compliance pathway. CLF supports maintaining the product compliance pathway for the following reasons:

- Multiple compliance pathways provide more flexibility for project teams. Some pathways rely on the design team while others rely more on contractors and owners. This approach mirrors other aspects of building code, which also have performance and prescriptive approaches.
- The product compliance pathway and WBLCA pathway are complementary. Put simply, we need better EPDs to improve WBLCA in the long run. EPDs can provide accurate embodied carbon measurements at the product scale that drive industrial decarbonization, competition, and innovation. Maintaining an EPD pathway keeps focus on the importance of accurate product-level measurement in the short and long term.

CLF heard the concerns about material equity, fairness, and EPD availability during the June 13th meeting and has made suggested edits to address these concerns. Specifically, our edits are focused on:

- Updating the reference values in Table 103.3.1 to the recently published 2025 CLF Baselines, which represent the most up-to-date industry average GWP estimates for North American-produced building materials.
- Simplified the product compliance pathway to require a 10% reduction from the reference values in 103.3.1, which aligns better with the reductions required in the WBLCA pathway
- Simplified compliance by allowing the reference values in Table 103.3.1 to be used as default values if product and facility-specific EPDs are not available. This rewards manufacturers who choose to disclose product impacts via EPDs and doesn’t penalize those who don’t. Compliance with the 10% reduction must be met with product and facility-specific EPDs, but not all products used on the project are required to have EPDs.

Who is the Carbon Leadership Forum (CLF)?

The Carbon Leadership Forum (CLF) is an independent non-profit organization with a mission to eliminate embodied carbon in buildings, materials and infrastructure to create a just and thriving future. As part of

our work, we conduct research on materials, buildings and infrastructure and act as a technical advisor to inform policy development and implementation related to our research. Policies and standards are critical to widespread reductions in embodied carbon, and building codes are a key pathway to broadening knowledge and action once tested strategies are available.

Summary

Code amendment proposal “24-GP1-118-R4” proposes feasible, ready-to-implement language for limiting the embodied carbon of larger commercial buildings in Washington state. The CLF proposed edits address many of the stakeholders' concerns while maintaining a voluntary code appendix that will result in embodied carbon reductions.

A handwritten signature in black ink, appearing to read "Jordan Palmeri", is positioned above the printed name.

Jordan Palmeri
Senior Manager, Low Carbon Products
Carbon Leadership Forum