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[sbcc@des.wa.gov](mailto:sbcc@des.wa.gov) (Submitted Electronically)

**RE: Joint Stakeholder Letter in Support of BRFW TAG recommendation to not move forward with 24-GP-118-R4 and its affiliated versions (BRFW & WBLCA Pathway)**

We respectfully submit this letter to express our support for the BRFW Tag's decision on June 27, 2025, to not advance Proposal 24-GP-118-R4 or its affiliated versions (proposal). This was a prudent and well-reasoned decision reflecting the committee's recognition that the proposal was outside its charter given existing legislative initiatives.

As the Committee affirmed by its action, there is no reason why this proposal should move forward. Advancing this proposal would undermine the ongoing deliberative process established by the Legislature through [2ESHB 1282](#).

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 and we look forward to working with stakeholders and legislature on this important topic.

We want to take this time to highlight for the State Building Code Council (SBCC) why it is important that this proposal remain excluded from the code adoption process.

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

Prior to June 13, 2025, the proposal's development—managed exclusively by New Buildings Institute (NBI) and Carbon Leadership Forum (CLF) without formal SBCC oversight—lacked transparency, did not provide adequate public access to revised drafts, and did not offer a mechanism for balanced stakeholder review or response. The proponents submitted new drafts each hearing, often the public did not see the draft prior to the hearing and comments submitted to NBI and CLF were cherry-picked without full and unbiased consideration. 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 or weight to the comments submitted.

The flawed procedures to date necessitate that this document be rejected as there is no real inclusion of industry into this document.

We feel that any future or revised language must be submitted with balanced stakeholder involvement through the legislative process.

We remain fully committed to advancing meaningful carbon reduction strategies through inclusive, transparent, and technically rigorous processes.

**Sincerely,**

**(Logos of coalition on page 3)**

For questions, please call:

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*Executive Director*

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