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Via Email:

May 25, 2025

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Stoyan and Todd,

Thank you for the opportunity to provide my public comments as presented today at the May 25<sup>th</sup> hearing and am following up to provide them as written comments. Please provide this testimony and comments to all the TAG members and thank them for their comments and engagement.

The concrete industry has over 36,000 EPDS nationally and almost 2,400 in Washington. Our EPDs increase each year as more projects are asking for EPDs. Our industry is not opposed to EPDs. We are in..... We are opposed to those that do not know our industry mandate what they think we should be doing. Concrete construction is a very collaborative process from design through construction in almost every phase.

**What holds us back from emission reductions?**

- Project specifications using traditional, boiler plate specifications that specify far more cement than needed to get the performance outcomes they need.
- Projects that don't take advantage of material innovations we can provide to meet performance and emission objectives because they don't want to pay for it.
- Specifications or ideas from those that don't understand the basics of concrete and direct how we should make our product regardless of performance.
- When this doesn't work, the producer gets the bill because they can't meet contractual performance or scheduling targets-

**Flexibility is key on how we manage changes.**

- Specified mix designs can change by the time bids are requested and awarded.
- When projects start months later, mix designs may not be the same as submitted for approval, because construction schedules change, Designers make changes in structural elements or other performance requirements change for new required strengths.
- Once the project starts, the mix designs may change multiple times during the job for more schedule or constructability changes.
- These changes require new EPDs be submitted.

## **WA policy has affected our material supply options**

- As a result, WA is a long-term importer of cements and cementitious materials.
- There is not enough production capability to meet the needs of the region let alone the state.
- Materials sources vary from in state, regional state sources, Canada, and Asia.
- Our supply chain and material sources limitations are very real, they change regularly and there are shortages.
- We need the flexibility and ability to manage all of these factors.
- Arbitrary carbon limits don't and can't anticipate all these changes.

What doesn't work is a one size fits all approach imposed by others on how we should design our products. Whether it's a sidewalk mix, 15,000 psi mix for a high rise with high strength steel or a bridge structure in Eastern Washington, concrete performance is more than emissions.

## **Collaboration:**

- Good collaboration begins early in the design process to create the strategy to meet or exceed carbon budgets of all structural materials used in a project. We do it every day.

Pre-determined carbon limits remove or minimize this collaboration. This will take the designer, contractor, and project team out of the equation, reduce innovations at all levels and becomes an obstacle to maximize emission reductions.

We don't need arbitrarily prescribed limits in the building code that are derived on statistically invalid data by others to tell us how to cut emissions on a strength-based approach while sacrificing fundamental performance and project team collaboration.

## **Simple steps to get reduced emissions;**

- Move to performance specifications versus prescriptive specifications
- Use the cement contents you need, not the cement contents you specify.
- Specify new blended cement technology such as Portland Limestone cements.
- Utilize supplemental cementitious materials such as Fly ash, slag and admixture technology and not limit innovation in materials.
- Ask us what we can do to meet emission objectives. Then we can make progress.

There are reasons why the legislature has rejected complex and prescriptive procurement bills over the last 4 sessions, they were ideas that didn't make sense.

In an active House and Senate Proviso, the legislature has asked the construction industry for our specific recommendations on how to achieve emission reductions and the proper use of EPDs. This process will conclude in the 2023 session.

HB 1103 as mentioned, did not pass out of committee, and not passed by Legislature.

As of today, the SBCC council is directly interfering with the work in process of the legislature and should reject any further consideration of these proposals.

There are many concerns with the proposal as presented and written. A belt and suspension approach mentioned today is the next level of complexity, redundancy and unnecessary criteria that will add additional costs as mentioned in RCW 19.127.020; *"To eliminate restrictive, obsolete, conflicting, duplicating and unnecessary regulations and requirements which could unnecessarily increase construction costs or retard the use of new materials and methods of installation or provide unwarranted*

*preferential treatment to types or classes of materials or products or methods of construction”.*

This is what the TAG and SBCC should be avoiding.

As there was no stakeholder engagement or outreach as the proposal was being drafted and was provided to the SBCC without stakeholder knowledge, I disagree with the statement this is a “*market-based solution*”. The marketplace was never involved in proposing this in any capacity.

Thank you,

A handwritten signature in black ink, appearing to read 'Bruce Chattin', with a long horizontal stroke extending to the right.

Bruce Chattin  
Executive Director  
Washington Aggregates and Concrete Association

CC Representative Larry Hoff, and Senator Lynda Wilson