

ONLY

A FEW

MORE RULES



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OFC – FEB 2026

CLEAN BUILDINGS DEADLINES ARE HERE.



**Clean Buildings Performance
Standard (CBPS)**

Commerce is a bit behind...

Compliance and Reporting Schedule

A building owner of a covered building must meet the following reporting schedule for complying with the standard, and every five years thereafter:



Tier 1 - Buildings more than 220,000 gross sq. ft, June 1, 2026



Tier 2 - Buildings more than 20,000 – less than 50,000 gross sq. ft, June 1, 2027



Tier 1 - Buildings more than 90,000 – less than 220,001 gross sq. ft, June 1, 2027



Tier 1 - Buildings more than 50,000 – less than 90,001 gross sq. ft, June 1, 2028

	Compliance Year				
	2025	Early Comp.	2026	2027	2028
Cascadia	Decarb	Tier 1			
Columbia Basin		Campus			
Highline	Decarb	Campus			
Lake WA		Campus			
Walla Walla		Campus			
Clover Park		Tier 1		Tier 2	
Renton		Tier 1		Tier 2	
Spokane CC		In process	Tier 1A	Tier 1B, 2	Tier 1C
Pierce Ft Steilacoom		In process	Tier 1A	Tier 2	Tier 1C
Pierce Puyallup		In process		Tier 2	Tier 1C
Spokane Falls		In process		Tier 2	Tier 1C
SPSCC		In process		Tier 2	Tier 1C
Bates			Tier 1A	Tier 2	Tier 1C
Seattle Central	Decarb		Tier 1A	Tier 1B, 2	Tier 1C
Bellevue				Tier 1B, 2	Tier 1C
Big Bend				Tier 1B, 2	Tier 1C
Clark	Decarb			Tier 1B, 2	Tier 1C
Edmonds	Decarb			Tier 1B, 2	Tier 1C
N Seattle	Decarb			Tier 1B, 2	Tier 1C
S Seattle				Tier 1B, 2	Tier 1C
Yakima Valley				Tier 1B, 2	Tier 1C
Bellingham Tech				Tier 2	Tier 1C
Centralia				Tier 2	Tier 1C
Everett				Tier 2	Tier 1C
Grays Harbor				Tier 2	Tier 1C
Green River				Tier 2	Tier 1C
Lower Columbia				Tier 2	Tier 1C
Olympic				Tier 2	Tier 1C
Peninsula				Tier 2	Tier 1C
Shoreline				Tier 2	Tier 1C
Skagit Valley	Decarb			Tier 2	Tier 1C
Tacoma	Decarb			Tier 2	Tier 1C
Wenatchee Valley				Tier 2	Tier 1C
Whatcom				Tier 2	Tier 1C

COMPLIANCE STATUS

- ✓ 5 colleges done until round 2 in 2030-33
- ✓ 8 decarbonization plans completed
- ✓ 2 colleges done with Tier 1 compliance
- ✓ 5 on schedule to file this month
- 2 with July 2026 deadline
- 20 with 2027-28 deadlines

WATCH OUT FOR SCAMS!

Buildings@commerce.wa.gov

Beware of Third-Party Communications

We've been informed that some building owners have received letters, notices or marketing materials from third parties that appear to come from or refer to the Department of Commerce or the Clean Buildings team. Unfortunately, some of the communications may be misleading or contain inaccurate information. If you ever receive a letter or a notice that seems suspicious, please contact us before taking action. We can help verify the authenticity of any correspondence. You can reach us by emailing **Buildings@Commerce.wa.gov** or by submitting a **Customer Support Form**.

THE REFRIGERANT MANAGEMENT PROGRAM DEADLINE IS NOW.

- *If you have a single “refrigerant containing unit” with more than 200 but less than 1,500 pounds of charge, you are required to register with Ecology within the next two weeks.*
- *Data records need to be current as of JAN 2026*
- *Data collection guidance and a spreadsheet tool are available.*



RMP DATA MANAGEMENT IS A BIT COMPLEX.

- Registration of all affected buildings and systems
- On-site records/documentation of all pertinent systems, maintenance, repairs, refrigerant purchases, and equipment replacements.
- Documented regular leak detection (quarterly for mid-sized systems),
- 14-day response window for leaks and related repairs.
- Immediate leak notifications to ECY.
- Annual reports of all relevant PMs, maintenance, repairs, replacements, and purchases of stock refrigerant.

MERCURY-CONTAINING LIGHT BULBS ARE PHASING OUT (HB 1185, 2024).

- Compact and linear fluorescent bulbs will not be available for sale after JAN 2029.
- Disposal of such bulbs is regulated as a dangerous waste, but they may usually be treated as universal waste.
- Pay attention to:
 - Shops & outbuildings still using legacy 70's – 80's lighting fixtures.
 - Your stockpile of linear and compact fluorescent bulbs.



WA BUILDING ENERGY CODE

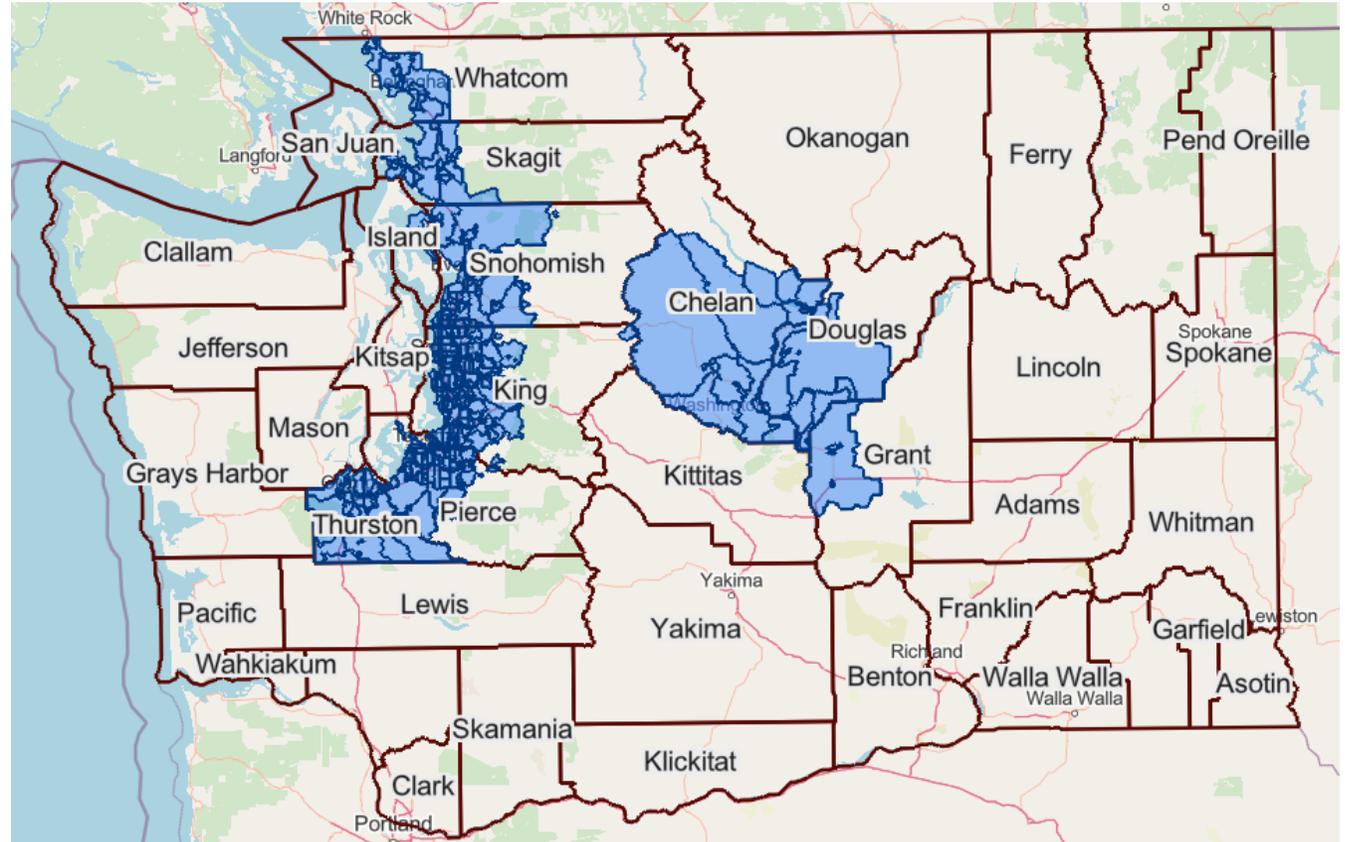


- 2021 Code became effective last year,
- 2024 Code is scheduled for adoption this year, effective November 1.
- 2021 restricts replacement of existing natural gas equipment; not onerous, but it could seriously impact an emergency replacement.
- 2021 also requires solar PV on new buildings and major renovations greater than 10,000 gsf.
 - 2024 Code drops that requirement to projects 5,000 gsf or larger.

BUSINESS ORGANICS MANAGEMENT

If your local waste management authority has an organics waste collection and diversion program, you are required to participate if you produce > 96 gallons of organic waste/week.

- [Ecology updates this requirement annually.](#)



GREENHOUSE GAS EMISSIONS

Per [RCW 70A.45.050](#), state agency emissions limits are:

- 15% below 2005 levels by 2020
- **45% below 2005 levels by 2030**
- 70% below 2005 levels by 2040
- 95% below 2005 levels by 2050; achieve net zero

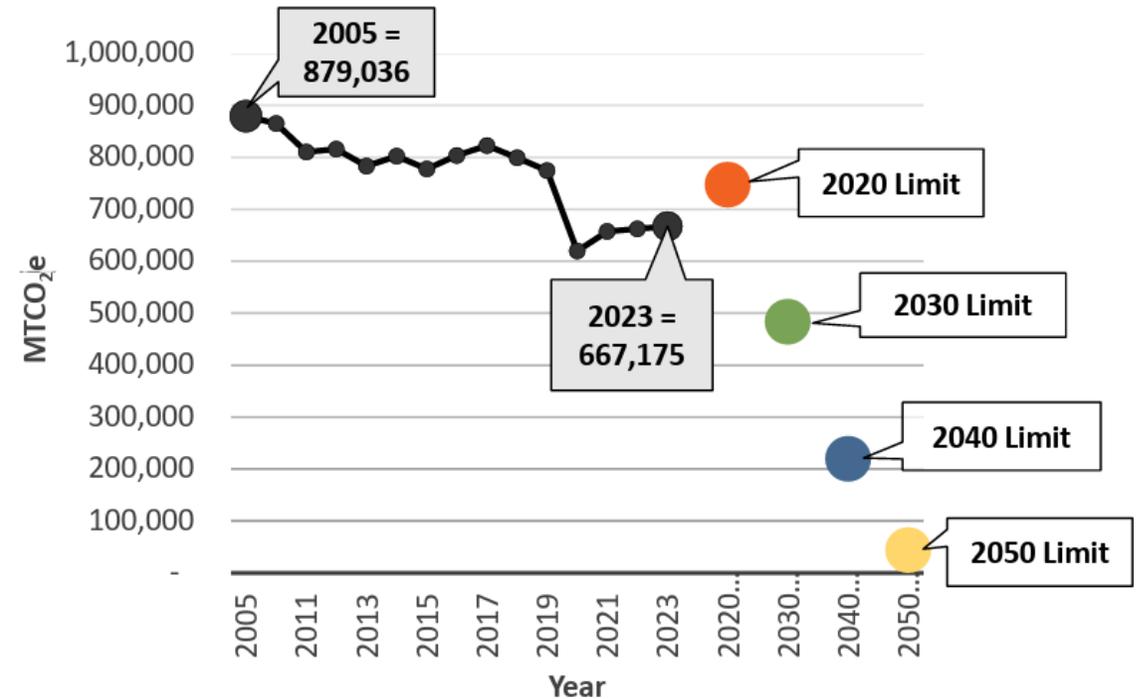
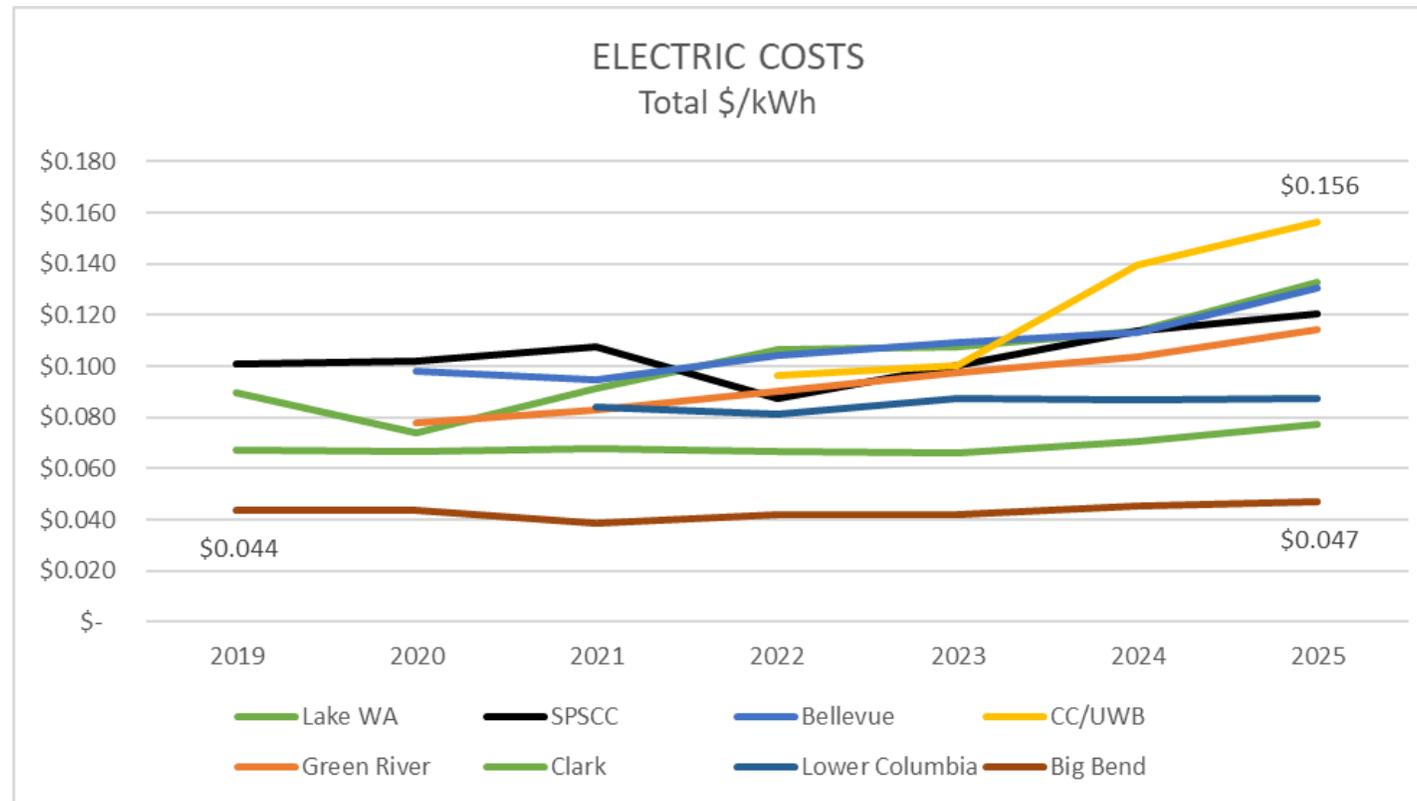


Figure 1: Greenhouse gas emissions from Washington state government operations, 2005-2023, and emission limits through 2050.

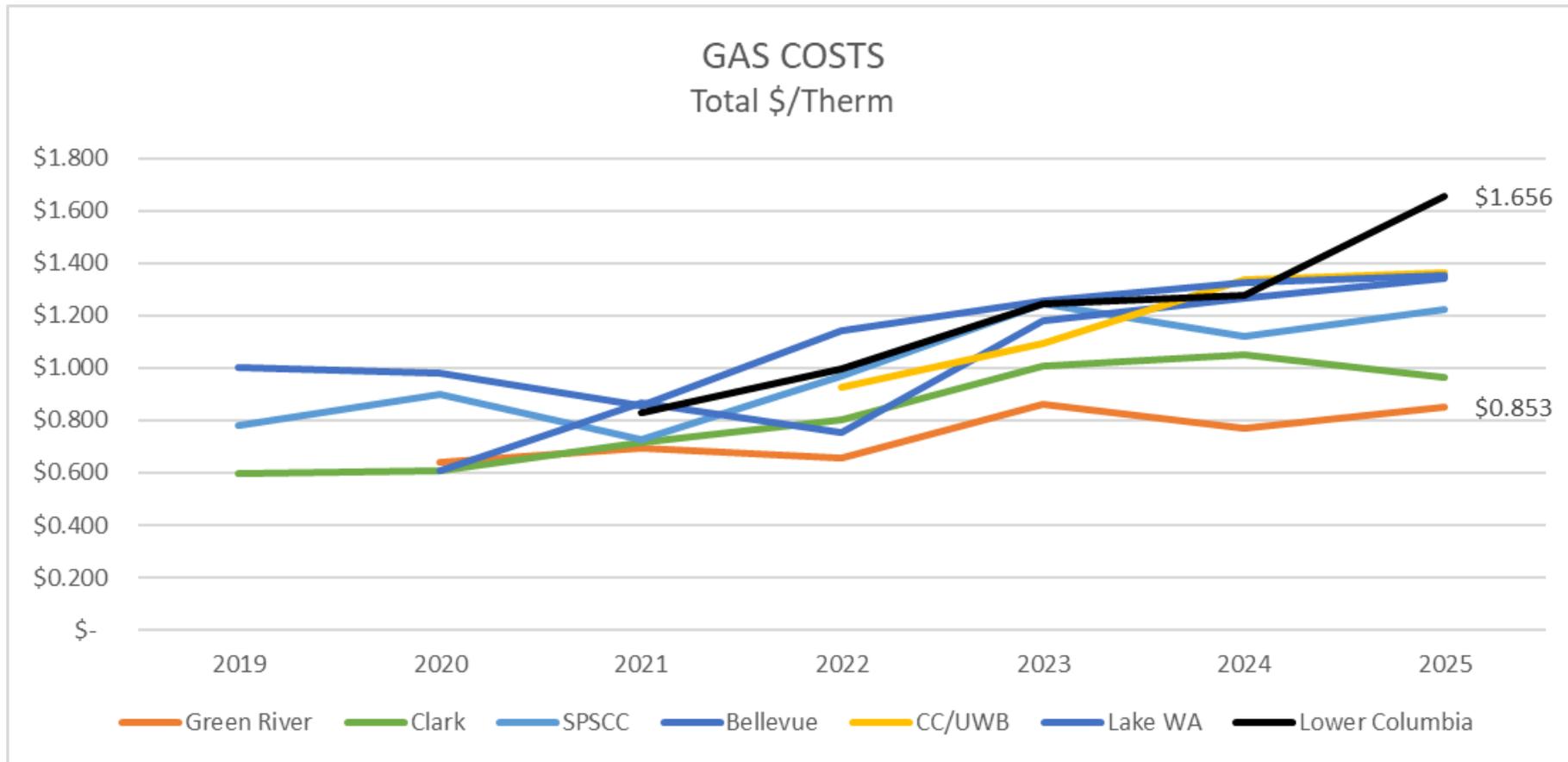
WHAT ABOUT GRANTS & INCENTIVES?

- Commerce Grants
 - Multiple grants and plenty of hoops to jump through.
- ECY VW Settlement
 - Mostly medium & heavy-duty vehicles right now.
- Utility incentives
 - Lighting, energy efficiency, recommissioning, strategic energy management...
- Federal Direct Pay
 - Limited availability, but some solar projects might still qualify.

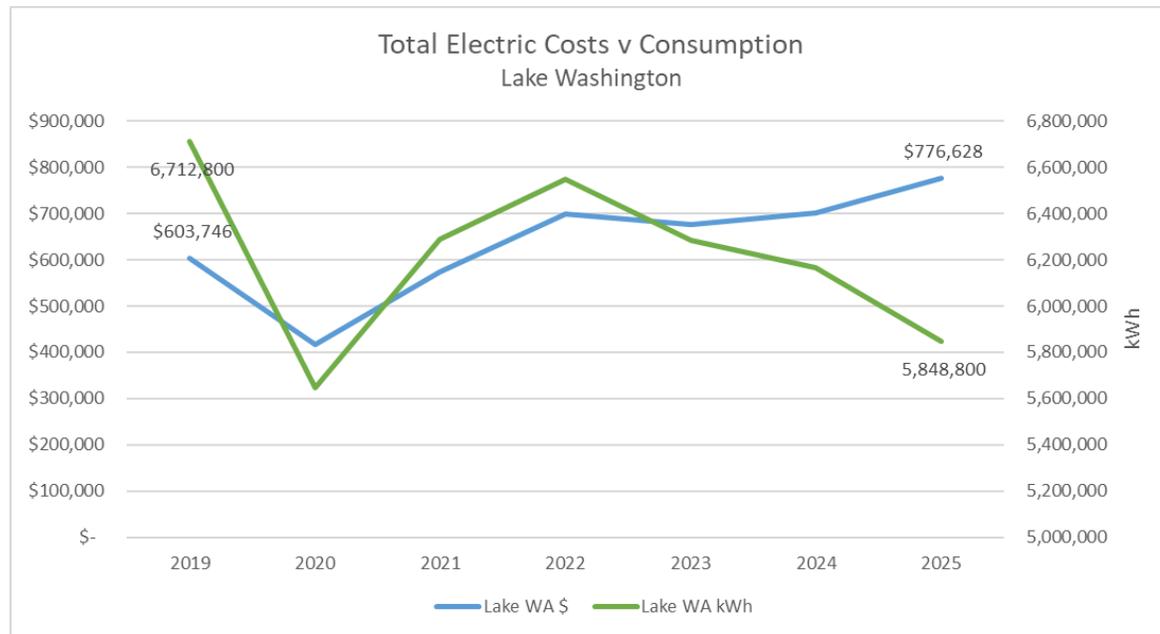
SOME ELECTRIC RATES ARE INCREASING.



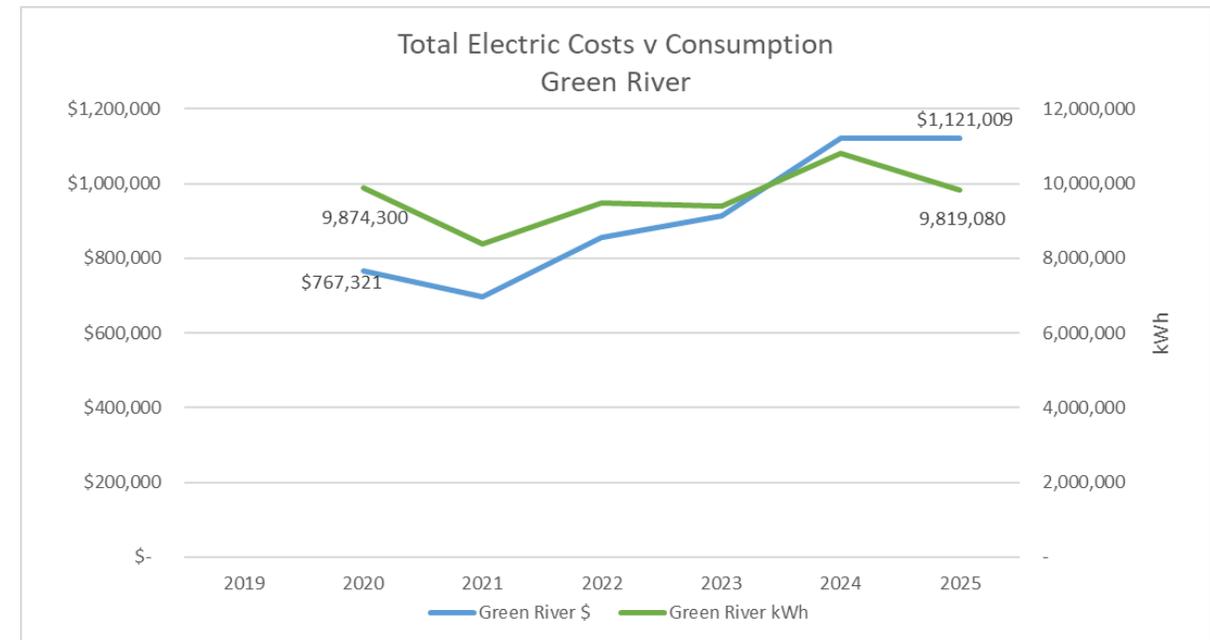
SO IS THE COST OF GAS.



YOU NEED ACTIVE ENERGY MANAGEMENT...

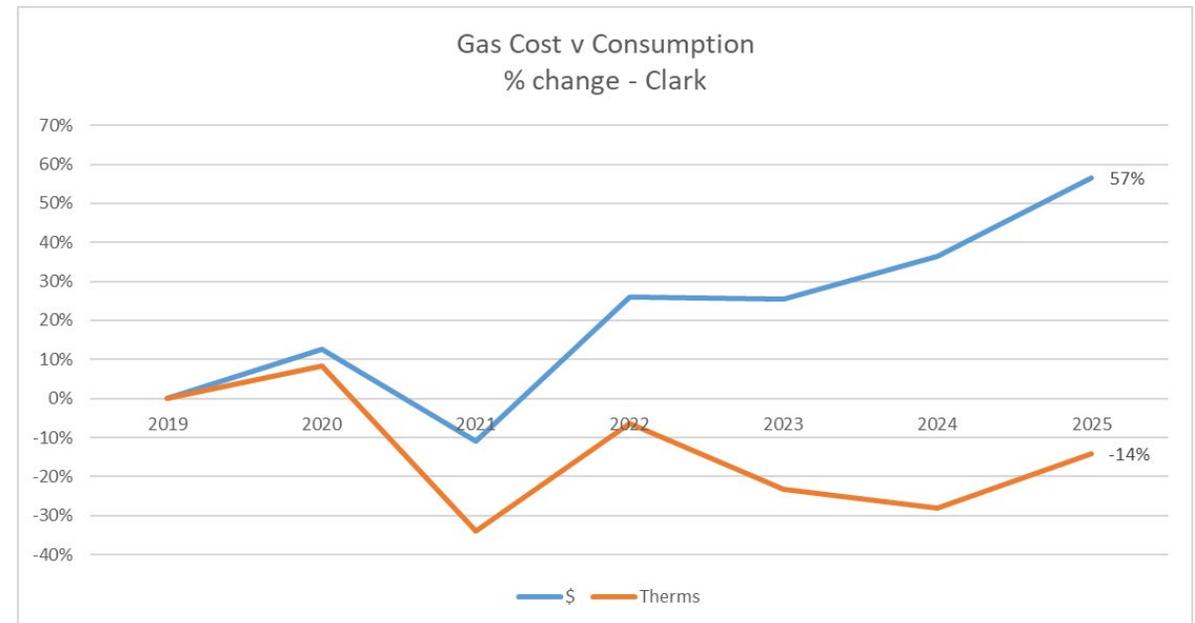
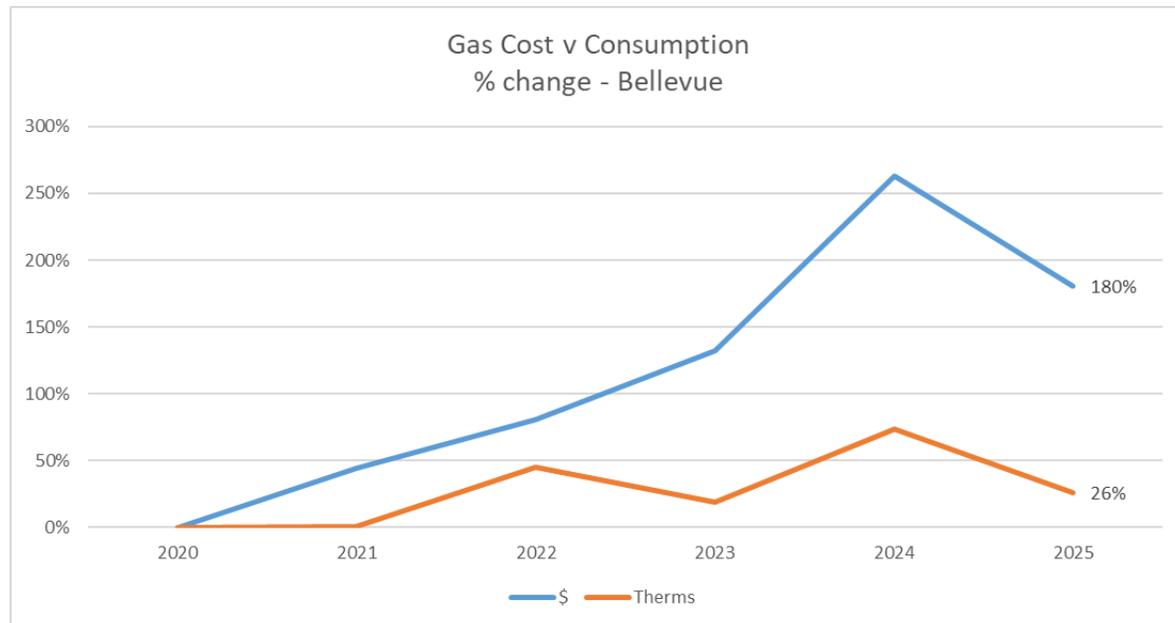


2022 peak consumption would have cost \$870,000 in '25, nearly another \$100,000.



2024 peak consumption would have cost \$1,233,000 in '25, a bit over another \$100,000.

GAS COSTS ARE EVEN SCARIER...



Percent change in total costs and consumption from baseline (first year of data). Consumption is being controlled, costs are out of your control.

A FEW OTHER DETAILS

- We're developing support and guidance, please reach out if you have suggestions for content or other questions.
- Join the DirectLine User Group (CMMS) to participate in change decisions and updates.

AS USUAL, REACH OUT FOR SUPPORT.

[SBCTC Capital Budget Sustainability](#)

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